



REPUBLIC OF CYPRUS  
SHIPPING DEPUTY MINISTRY

Circular No. 7/2024

15 February 2024

File: SDM 05.13.008

To all Registered owners, Registered bareboat charterers,  
Managers and Representatives of Cyprus ships

To all Owners, Managers, Representatives and Agents of  
ships, irrespective of flag, based in Cyprus

**Subject: Insertion of new Article 3q in Council Regulation (EU) No. 833/2014 of 31 July 2014 concerning the restrictive measures in view of Russia's actions destabilising the situation in Ukraine, as amended**

Sanctions Information Notice No. 8/2023 refers to the 12<sup>th</sup> package of the restrictive measures, which the European Union (EU) has adopted on 18-Dec-2023 against the Russian Federation in view of the continuing situation in Ukraine and highlights some of their maritime-related aspects.

2 In this Circular, unless otherwise expressly provided all references to “Article” and “Annex” refer to “Article” and “Annex” of Council Regulation (EU) No. 833/2014 as amended.

3 The purpose of this Circular is to provide guidance on certain specific aspects of Article 3q, which has now been inserted by means of amending Council Regulation (EU) 2023/2878.

3.1 The information provided in this Circular applies to tankers falling under Harmonized System (HS) code ex 8901 20 which have been, since 5-Dec-2022:

- (1) registered or are registered in the Register of Cyprus Ships, including the Special Book of Parallel Registration; and
- (2) owned or are owned, directly or indirectly, by nationals of an EU Member State, natural persons residing in an EU Member State, or to legal persons, entities or bodies which are established in the EU, irrespective of the State of the registration of the ship or the State whose flag the ship is flying,

on the understanding that Article 3q(1) applies as from 19-Dec-2023.

**Article 3q**

4 Annex 1 of this Circular provides the text of Article 3q.



4.1 The main aim of Article 3q is to introduce transparency in the transactions for the sale and purchase of tankers capable of transporting crude oil or petroleum products in bulk, listed in Annex XXV, to any third country. This is done in an effort to address the risks of evasion of the prohibition that already exist for the import into the European Union of crude oil or petroleum products listed in Annex XXV which originate in Russia, or which have been exported from Russia and of the Russian Oil Price Cap imposed by the G-7.

4.2 The provisions apply to nationals of an EU Member State, to natural persons residing in an EU Member State, and to legal persons, entities or bodies which are established in the EU and employ a two-pronged approach with authorisation and notification requirements depending on the nationality and/or the place of establishment of the purchaser or transferee and the use of the tanker:

- (1) In case a tanker is to be sold, on or after 19-Dec-2023, to a natural or legal person, entity or body **in Russia** or for **use in Russia**, the sale must be authorised by the competent authority of an EU Member State, at the conditions it deems appropriate (Article 3q(1) to 3q(3)); and
- (2) In case a tanker is to be sold to a natural or legal person, entity or body in a **third country** other than Russia or for use in a **third country** other than Russia, the sale must be notified to the competent authority of an EU Member State (Article 3q(4)).

Any sale or transfer of ownership of a tanker made between 05-Dec-2022 and 19-Dec-2023 to a third country, including Russia, shall be notified to the competent authorities before 20-Feb-2024.

4.3 Annex 2 of this Circular provides specific guidance on certain aspects of Article 3q and is without prejudice to any related guidance issued by the European Commission, for example, in the form of Frequently Asked Questions.

#### ***Derogation pursuant to the provisions of Article 3q(2)***

5 As from 19-Dec-2023, the sale, or otherwise transfer of ownership, directly or indirectly, of tankers falling under HS code ex 8901 20 to any natural or legal person, entity or body in Russia or for use in Russia, is prohibited and can only take place if a **derogation** pursuant to the provisions of Article 3q(2) has been granted.

5.1 The registered owner of the tanker who wishes to invoke the provisions of Article 3q(2), should submit, an application requesting the issue of a derogation from the requirements of Article 3q(1), to the **Sanctions Implementing Unit in the Financial Sector** of the **Ministry of Finance** of the Republic of Cyprus (e-mail: [sanctionsunit@mof.gov.cy](mailto:sanctionsunit@mof.gov.cy)).

5.1.1 In case the application concerns a tanker which is already registered in the Register of Cyprus Ships, including the Special Book of Parallel Registration, the applications and all supporting documentation should also be sent to the **Shipping Deputy Ministry** of the Republic of Cyprus (email: [perm.sec@dms.gov.cy](mailto:perm.sec@dms.gov.cy)).

5.2 Such applications should be accompanied by the required, in the view of the applicant, documentation in testimony and/or support of the arguments made. In particular, they should explain and provide appropriate documentary evidence and undertakings demonstrating how the provisions of Article 3q(3) are, or will be, met.

***Notification pursuant to the provisions of Article 3q(4)***

6 As from 19-Dec-2023, the sale, or otherwise transfer of ownership, directly or indirectly, of tankers falling under HS code ex 8901 20 to any natural or legal person, entity or body in a third country other than Russia or for use in a third country other than Russia, has to be notified to the competent authority **immediately** in accordance with the provisions of Article 3q(4).

6.1 Any sale or transfer of ownership of a tanker to a third country, including Russia, which occurred between 05-Dec-2022 and 19-Dec-2023 shall be notified to the competent authorities before 20-Feb-2024 in accordance with the provisions of Article 3q(5).

6.2 The registered owner of the tanker who wishes to make a notification in accordance with the provisions of Article 3q(4) or 3q(5), should submit the required information and documentation to the **Ministry of Foreign Affairs** of the Republic of Cyprus (e-mail: [nvarellas@mfa.gov.cy](mailto:nvarellas@mfa.gov.cy)).

6.2.1 In case the notification concerns a tanker which, immediately prior to its sale or transfer of its ownership, was registered in the Register of Cyprus Ships, including the Special Book of Parallel Registration, the notification and all supporting documentation **should also** be sent to **Shipping Deputy Ministry** of the Republic of Cyprus (email: [perm.sec@dms.gov.cy](mailto:perm.sec@dms.gov.cy)).

6.3 The second paragraph of Article 3q(4) sets out what information and documents the notification to the competent authority shall at least contain. Further advice in this respect, in the form of a detailed Guidance including a recommended declaration, is provided in Annex 2 of this Circular.



**Dr Stelios D. Himonas**  
**Permanent Secretary**

- Cc: - Attorney General of the Republic
- Permanent Secretary, Ministry of Foreign Affairs
  - Permanent Secretary, Ministry of Finance
  - Permanent Secretary, Ministry of Defence
  - Permanent Secretary, Ministry of Energy, Commerce and Industry
  - Permanent Secretary, Ministry of Transport, Communications and Works
  - Diplomatic and Consular Missions and Honorary Consular Officers of the

Republic

- Maritime Offices of the Shipping Deputy Ministry abroad
- General Manager, Cyprus Ports Authority
- Director, Department of Customs and Excise
- Registrar of Companies and Intellectual Property
- Commander, Cyprus Marine Police
- Cyprus Bar Association
- Institute of Certified Public Accountants of Cyprus
- Cyprus Shipping Chamber
- Cyprus Union of Shipowners
- Cyprus Shipping Association

## **Annex 1**

### **Article 3q**

1. It shall be prohibited for any national of a Member State, natural person residing in a Member State, and legal person, entity or body which is established in the Union to sell, or otherwise transfer ownership, directly or indirectly, of tankers for the transport of crude oil or petroleum products listed in Annex XXV, falling under HS code ex 8901 20, whether or not originating in the Union, to any natural or legal person, entity or body in Russia or for use in Russia.

2. By way of derogation from paragraph 1, the competent authorities may authorise, under the conditions they deem appropriate, the sale or other transfer of ownership of tankers for the transport of crude oil or petroleum products listed in Annex XXV, falling under HS code ex 8901 20.

3. When deciding on requests for the authorisation referred to in paragraph 2 of this Article, the competent authorities shall not grant an authorisation for a sale or other transfer of ownership to any natural or legal person, entity or body in Russia or for use in Russia, if they have reasonable grounds to believe that the tanker would be used to transport, or be re-exported to transport, crude oil or petroleum products listed in Annex XXV, originating in Russia or exported from Russia for import into the Union in breach of Article 3m or for transport to third countries at a purchase price per barrel exceeding the price laid down in Annex XXVIII.

4. Any sale or other arrangement entailing a transfer of ownership by a national of a Member State, a natural person residing in a Member State, and a legal person, entity or body which is established in the Union to any third country of tankers for the transport of crude oil or petroleum products listed in Annex XXV, falling under HS code ex 8901 20, with the exception of a sale or other transfer of ownership prohibited under paragraph 1, shall be notified immediately to the competent authorities of the Member State where the owner of the tanker is a citizen, a resident or is established.

The notification to the competent authority shall contain at least, the following information: the identities of the seller and the purchaser, and where applicable the incorporation documents of the seller and the purchaser including the shareholding and management; the IMO ship identification number of the tanker; and the Call Sign of the tanker.

5. Any sale or other transfer of ownership of tankers as referred to in paragraphs 1 and 4 after 5 December 2022 and prior to 19 December 2023 shall be notified to the competent authorities before 20 February 2024.

6. The Member State concerned shall inform the other Member States and the Commission of any authorisation granted under paragraph 2, and of any notification under paragraphs 4 and 5, within two weeks of the authorisation or notification.

## Annex 2

### Guidance in relation to Article 3q of Council Regulation (EU) No. 833/2014 as amended

#### **Introduction**

- 1 In the present communication, unless otherwise provided, the term(s):
- (1) “*Article*” and “*Annex*” mean “*Article*” and “*Annex*” of Council Regulation (EU) No. 833/2014 as amended;
  - (2) “*EU person concerned*” refers to nationals of an EU Member State, to natural persons residing in an EU Member State, and to legal persons, entities or bodies which are established in the EU.
  - (3) “*ship*” refers to a tanker of a type which are falling under Combined Nomenclature (CN) codes ex 8901 20 or Harmonized System (HS) code ex 8901 20.

1.1 The present guidance has been developed using terms as defined in the *Companies Law, Cap. 113* as amended of the Republic of Cyprus. In case the matter under consideration concerns a legal person, which has been incorporated elsewhere, this guidance should be read as using the equivalent terms which are used in the laws of the State governing the incorporation of the legal person.

#### **Requirements for notification**

2.1 Article 3q(4) establishes an obligation of an EU person concerned to notify the competent authority where the owner of the tanker is a citizen, a resident or is established, of any “*sale or other arrangement entailing a transfer of ownership*” of a tanker which can be used for the transport of crude oil or petroleum products listed in Annex XXV to a third country, other than Russia.

2.2 Article 3q(4) should be read in conjunction with Article 3q(1) which prohibits an EU person concerned to sell, or otherwise transfer ownership, directly or indirectly, of tankers for the transport of crude oil or petroleum products listed in Annex XXV, falling under HS code ex 8901 20, whether or not originating in the EU, to any natural or legal person, entity or body in Russia or for use in Russia.

2.3 Thus, Article 3q(4) obliges an EU person concerned:

- (1) to carry out the necessary due diligence with a view to ascertaining and documenting, to its satisfaction, that the tanker is not being sold or transfer to the ownership of any natural or legal person, entity or body in Russia or for use in Russia; and
- (2) in case is satisfied that the tanker is not being sold or transfer to the

ownership of any natural or legal person, entity or body in Russia or for use in Russia to notify, the competent authority where the owner of the tanker is a citizen, a resident or is established.

2.4 Article 3q does not specify the information or documentation that the seller or transferor should seek from the purchaser or transferee with a view to ascertaining and documenting, to its satisfaction, that the tanker is not being sold or transferred to the ownership of any natural or legal person, entity or body in Russia or for use in Russia.

2.5 As a result, the matter is the sole responsibility of the seller or transferor who is obliged to request from the purchaser or transferee all information which explicitly document the due diligence done.

2.6 If the matter involves any declarations made by either the seller or transferor or the purchaser or transferee or by both, it is advisable, that these be properly executed and witnessed and annexed to the Memorandum of Agreement for the Sale and Purchase of the tanker.

### ***Obligation to comply***

3.1 The registered owner is the one who owns the ship and thus it has the power to conclude a Memorandum of Agreement for the Sale and Purchase of the ship, to sell the ship and to transfer the ownership of the ship to another party.

3.2 Article 3q(4) uses the term the “*owner of the tanker*” and thus it refers to the natural or legal person, entity or body which is the registered owner of the ship, irrespective of whether the State of the registration of the ship or the State whose flag the ship is flying, is an EU Member State or not.

3.3 In Article 3q, the expressions “*or otherwise transfer ownership*” (Article 3q(1)); “*other transfer of ownership*” (Article 3q(2) to 3q(5)) and “*other arrangement entailing a transfer of ownership*” (Article 3q(4)) have the same meaning.

3.4 Transfer of ownership should be understood broadly, covering for instance situations such as sale, barter, relinquishment, inheritance, interests in a trust or other similar legal arrangement as well as any other sort of division of the ownership or transfer of title such as a corporate restructuring. The broad interpretation aims at avoiding the circumvention of the measure by hiding the genuine nature of the transaction.

3.5 Article 3q(4) is not prefaced in a manner which precludes or excludes the application of Article 13. Thus, it should be read, interpreted, and applied in conjunction with Article 13 which provides that Council Regulation (EU) No. 833/2014 applies:

- (a) within the territory of the Union;
- (b) on board any aircraft or any vessel under the jurisdiction of a Member State;
- (c) to any person inside or outside the territory of the Union who is a national

- of a Member State;
- (d) to any legal person, entity or body, inside or outside the territory of the Union, which is incorporated or constituted under the law of a Member State;
- (e) to any legal person, entity or body in respect of any business done in whole or in part within the Union.

3.6 Hence and notwithstanding the absence of the expression “*directly or indirectly*”, all natural persons and all legal persons, entities or bodies which are amongst those referred to in Article 13(c), 13(d) and 13(e) and are, in anyway, involved with the registered owner of the tanker or with any natural or legal person who, for example, is a shareholder or a director of the legal person who is the registered owner, etc., have to comply with the requirements imposed by Article 3q(4).

3.7 As a result, the requirement applies to all shareholders and to all directors of legal persons, entities or bodies who are subject to Articles 13(c) to 13(e), irrespective of whether such shareholders or directors have individually or collectively controlled interests.

3.8 The use of intermediaries to carry out the sale or transfer of the ownership does not relieve an EU person concerned, of the obligation to notify the competent authority.

3.9 In essence, Article 3q(4) obliges any EU person concerned which, directly or indirectly, owns a tanker, irrespective of the State of the registration of the ship or the State whose flag the ship is flying, to notify the competent authority.

### ***Tankers falling under HS code ex 8901 20***

4.1 Article 3q(1) and 3q(4) refer to “*tankers for the transport of crude oil or petroleum products listed in Annex XXV, falling under HS code ex 8901 20*”. Annex XXV lists crude oil and petroleum products which fall under CN codes of ex 2709 00 and 2710.

4.2 Thus, Articles 3q(1) and 3q(4) only apply to tankers which are falling under HS code ex 8901 20 and which are capable of transporting crude oil and petroleum products with CN codes of ex 2709 00 and 2710, i.e. crude oil and petroleum products in liquid form, in bulk, at atmospheric pressure.

4.3 An LNG or LPG carrier is a tanker falling under HS code 8901 20. However, such ships are capable of carrying, in bulk, petroleum gases and other gaseous hydrocarbons which are falling under CN codes 2711 and thus they are not subject to Articles 3q(1) and 3q(4).

### ***The term “for use in Russia”***

5.1 The objective of the provisions of Article 3q(1) is to establish monitoring and controls over the sale or otherwise transfer of ownership, directly or indirectly, of tankers falling under HS code ex 8901 20 which can be used for the transport of crude oil or petroleum products listed in Annex XXV originating in, or exported from Russia, in contravention of the prohibitions imposed by the provisions of Article 3m or 3n.



5.2 The provisions of Article 3q(1) apply when the sale or otherwise transfer of ownership involve, as seller or transferor, a national of an EU Member State, a natural person residing in an EU Member State, or a legal person, entity or body which is established in the Union and, as purchaser or transferee, any natural or legal person, entity or body in Russia.

5.3 Bearing in mind Article 12, the term “*for use in Russia*” should be understood in the context of the same objective i.e. the use of a tanker, by the party purchasing the tanker, for the transport, including through ship-to-ship transfers, of crude oil or petroleum products listed in Annex XXV originating in, or exported from, Russia, in contravention of the prohibitions imposed by the provisions of Article 3m or 3n.

***When the notification should be made?***

*for tankers which are sold, or their ownership is transferred on or after 19-Dec-2023*

6.1.1 Article 3q(4) specifies that the EU person concerned shall notify immediately the competent authorities of the EU Member State where the owner of the tanker is a citizen, a resident or is established of any sale or other arrangement entailing a transfer of ownership of the tanker to a third country.

6.1.2 The conclusion of a Memorandum of Agreement for the Sale and Purchase of the ship is a statement of the intention of the registered owner to sell or transfer the ownership of the tanker to the purchaser or transferee.

6.1.3 The date and time of the sale or transfer of the ownership of a ship is determined by the date and time of handing over to the purchaser or transferee the duly executed Bill of Sale of the ship and/or signing the Certificate of Delivery and Acceptance of the ship, whichever of the two occurs later.

6.1.4 The registered owner should not hand over the Bill of Sale of the ship and/or sign the Certificate of Delivery and Acceptance of the ship before he/ she is satisfied that he/ she is in possession of all the information and documentation which needs to be submitted (see second paragraph of Article 3q(4)) when notifying the competent authority where the owner of the tanker is a citizen, a resident or is established.

6.1.5 The registered owner should notify the competent authority of the EU Member State where the owner of the tanker is a citizen, a resident or is established **within 48 hours** of handing over the Bill of Sale of the ship or signing the Certificate of Delivery and Acceptance of the ship, whichever of the two is later.

6.1.6 Any other EU person concerned, other than the registered owner, should notify the competent authority of the EU Member State where the owner of the tanker is a citizen, a resident or is established **within 96 hours** of the handing over of the Bill of Sale of the ship or of the signing of the Certificate of Delivery and Acceptance of the ship, whichever of the two is later.

*for tankers which have been sold or their ownership has been transferred on or after 05-Dec-2022 and before 19-Dec-2023*

6.2.1 Any EU person concerned should notify the competent authority of the EU Member State where the owner of the tanker is a citizen, a resident or is established before 20-Feb-2024.

***A legal person, entity or body which is established in the Union***

7 For the purposes of Article 3q, in relation to:

- (1) a legal person, entity or body which has been incorporated under the laws of an EU Member State, they are considered as having been established in the EU under the laws of the EU Member States which they have been incorporated;
- (2) a legal person, entity or body which has been incorporated under the laws of third countries, they are considered as having been established in the EU under the laws of the Member State which has granted them permission to do business in whole or in part within the EU, for example, to register the ownership of a tanker in anyone of the EU Member States.

***Section 5(1)(b)(iii) of Law 45 of 1963 as amended***

8.1 In this section the expression “Member State” has the same meaning as defined in section 2(1) of the Merchant Shipping (Registration of Ships, Sales and Mortgages) Laws of 1963 to 2020 (Law 45 of 1963 as amended) and refers to a Member State of the European Union or other contracting party to the European Economic Area Agreement.

8.2 Section 5(1)(b)(iii) of Law 45 of 1963 as amended states that a ship may not be registered in the Register of Cyprus Ships unless the total (100%) of the shares of the ship are owned by one or more corporations, which have been established and operate outside the territory of the Republic and outside the territory of any other Member State, which are controlled by Cypriot citizens or natural persons who are citizens of any other Member State.

8.3 In addition, section 5(4) of Law 45 of 1963 as amended states that the term “controlled” means that either more than fifty per cent (50%) of the shares of the corporation or corporations, are owned by Cypriot citizens or citizens of any other Member State, or the majority of the Directors of the corporation or corporations, are Cypriot citizens or citizens of any other Member State.

8.4 A legal person, entity or body which is incorporated under the laws of any State other than a Member State who is the registered owner of a Cyprus ship pursuant to section 5(1)(b)(iii) of Law 45 of 1963 as amended is to be considered, for the purposes of Article 3q(4) as, a legal person, entity or body which is established in Cyprus.

***What the notification should contain?***

9.1 The second paragraph of Article 3q(4) sets out what information and documents the notification to the competent authority shall at least contain.

9.1.1 It is recommended for the interested parties to use the model attached to this guidance, which constitutes an aid on the issue and specifies in detail the information and documents which are needed.

9.2 If the date of issue of any one of the aforesaid documents (other than declarations) is more than five working days old, the document in question should be accompanied by a statement of the secretary of the legal person making the notification, the seller or transferor, the purchaser or transferee or their intermediaries, as the case may be, certifying that the information provided by the document is true and correct on the date of submission.

9.3 In addition, and notwithstanding the aforesaid, it is advisable to include in the documents relating to the above notification, a declaration to be made by the seller or transferor affirming that:

- (1) the purchaser or transferee is not a natural or legal person, entity or body in Russia;
- (2) the purchaser or transferee is not acting for the benefit of a natural or legal person, entity or body listed in Annex I to Council Regulation (EU) No. 269/2014 or subject to the restrictive measures provided for in Council Regulation (EU) No. 833/2014 as amended;
- (3) the purchaser or transferee has assured the seller or transferor that the tanker will not be used in Russia for the transport, including to ship-to-ship transfer, of crude oil or petroleum products listed in Annex XXV and originating in, or exported from, Russia in violation of the prohibitions imposed by Articles 3m and 3n;
- (3) the seller or transferor has not sold or transfer the ownership of the ship for use of the ship in Russia or for the transport, including to ship-to-ship transfer, of crude oil or petroleum products listed in Annex XXV and originating in, or exported from, Russia in violation of the prohibitions imposed by Articles 3m and 3n.

***Notification in case the EU person concerned no longer exists***

10.1 For tankers which have been sold or their ownership has been transferred on or after 05-Dec-2022 and before 19-Dec-2023, in case the concerned are:

- (1) nationals of an EU Member State or natural persons residing in an EU Member State was or is demised before 20-Feb-2024, or
- (2) natural persons residing in an EU Member State was or is no longer residing in an EU Member State before 20-Feb-2024; or
- (3) legal persons, entities or bodies which were established in the EU were or are dissolved or wind down in accordance with the laws of the State they had been incorporated,

the notification should be done by the legal representative of the seller or transferor at the time of the sale or transfer of the ownership of the tanker or in his/her absence by any natural or legal person which was empowered by the seller or transferor at the time of the sale or transfer of the ownership of the tanker to act on his/her behalf.

10.2 In such a case the information and documents required by the second paragraph of Article 3q(4) and the declaration recommended by this guidance , should be provided to the extent possible. In addition, the submission should be accompanied by a note laying out the circumstances and appropriate documentary evidence provided by public authorities testifying the information provided.

## Model of a Declaration

**Note:** This model has been developed using terms as defined in the Companies Law, Cap. 113 as amended of the Republic of Cyprus. In case the matter under consideration concerns a legal person, which been incorporated elsewhere, this model should be read as using the equivalent terms as used in the laws of the State governing the incorporation of the legal person.

**Note:** This model has been developed assuming the seller or transferor, the purchaser or transferee and their intermediates are legal person. If natural persons are involved the model should be amended accordingly using parts B-1 and B-2 as a guide.

**Note:** If the date of issue of any one of the documents (other than declarations) referred in B-2, D, E or F is more than five working days old, the document in question should be accompanied by a statement of the secretary of the legal person making the notification, the seller or transferor, the purchaser or transferee or their intermediaries, as the case may be, certifying that the information provided by the document is true and correct on the date of the submission.

**Notification pursuant to Article 3q(4) of Council Regulation (EU) No. 833/2014 as amended**

to be made where the owner of the tanker is  
a citizen or a resident of the European Union or is established in Cyprus

1 I the undersigned:

A. *Natural person making the notification on behalf of a natural or legal person*

Name and Surname	
Nationality and/or Citizenship	
Identification (Type, Issued by and Number)	
Work employer	
Work title, role, or function	
Work Address	
Work telephone	
Work e-mail address	

in my capacity as **[enter capacity for example director, secretary, attorney-in-fact]** of:

B. *Notification made on behalf of a natural or legal person*

For a natural person complete the section B-1, delete section B-2 and go to part C.

For a legal person delete section B-1, complete the section B-2 and go to part C.

B-1 *Notification made on behalf of a natural person*

Name and Surname	
Nationality and/or Citizenship	
Identification (Type, Issued by and Number)	
Work employer	
Work title, role or function	
Work Address	
Work telephone	
Work e-mail address	
Country of nationality	
Country of residency	
Relation with the Seller or transferor	

## B-2 Notification made on behalf of a legal person

Registered Name	
Incorporated under the law of	
Place of incorporation	
Reference or identification number	
VAT number (if applicable)	
Registered address	
Contact telephone	
Contact e-mail address	
Place of establishment in the European Union*	
Relation with the Seller or transferor	

\* if it has been incorporated in a third country

Note: In B-1 and B-2 the relation of the natural or legal person with the Seller, for example, shareholder of a shareholder of the Seller must be explained and the information provided should be attested by attached related documents.

hereby declare for, and on behalf of the natural or legal person named under this part that the tanker:

## C. Particulars of the tanker

Name of tanker	
IMO number	
Call Sign	
Type and subtype of tanker <sup>1</sup>	
Port of registry	
Flag State	
State of registration	

is falling under Harmonized System (HS) code ex 8901 20 and can be used for the transport of crude oil or petroleum products listed in Annex XXV of Council Regulation (EU) No. 833/2014 as amended has been:

Sale of ownership	<input type="checkbox"/> Yes <input type="checkbox"/> No (please indicate)
Otherwise transfer of ownership	<input type="checkbox"/> Yes <input type="checkbox"/> No (please indicate)
Date of sale or transfer of ownership	
Date of transaction before 19-Dec-2023	<input type="checkbox"/> Yes <input type="checkbox"/> No (please indicate)

sold or its ownerships has been transferred, as indicated above, by:

## D. Seller or transferor (the legal person who sold or transfer the ownership of the tanker)

Registered Name	
Incorporated under the law of	
Place of incorporation	
Reference or identification number	
VAT number (if applicable)	

<sup>1</sup> The types and subtypes of tankers are: Crude Oil Tanker (subtypes: Crude Oil Tanker, Crude/Oil Products Tanker, Shuttle Tanker), Oil Products Tanker (subtypes: Products Tanker, Tanker (unspecified)), Bitumen Tanker (subtype: Asphalt/Bitumen Tanker), Coal/Oil Mixtures Tanker, Bunkering Tanker and Chemical/Oil Products Tanker.

Registered address	
Contact telephone	
Contact e-mail address	
Place of establishment in the European Union*	

\* if it has been incorporated in a third country

#### D-1 Shareholding structure

Number of authorized shares**		Number of issued shares**	
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\*\* Indicate the class or category of shares, if relevant.

*when shareholder(s) are natural persons*

Name and Surname	Address	Nationality	Shares***

*when the shareholder(s) are legal persons*

Registered Name	Registered Address	Nationality	Shares***

\*\*\* Indicate the number or percentage of shares and the class or category of shares, if relevant.

#### D-2 Management structure

Director(s)

*when the director(s) are natural persons*

Name and Surname	Address	Nationality	Voting rights****

*when the director(s) are legal persons*

Registered Name	Registered Address	Nationality	Voting rights****

\*\*\*\* to be completed only if the director(s) have not equal voting rights.

Secretary(ies)

*when the secretary(ies) are natural persons*

Name and Surname	Address	Nationality

*when the secretary(ies) are legal persons*

Registered Name	Registered Address	Nationality

to:

E. Purchaser or transferee (the legal person who purchased, or to whose ownership the tanker was transferred)

Registered Name	
Incorporated under the law of	
Place of incorporation	
Reference or identification number	
VAT number (if applicable)	
Registered address	
Contact telephone	
Contact e-mail address	

#### E-1 Shareholding structure

Number of authorized shares**		Number of issued shares**	
-------------------------------	--	---------------------------	--

\*\* Indicate the class or category of shares, if relevant.

*when the shareholder(s) are natural persons*

Name and Surname	Address	Nationality	Shares***

*when the shareholder(s) are legal persons*

Registered Name	Registered Address	Nationality	Shares***

\*\*\* Indicate the number or percentage shares and the class or category of shares, if relevant.

## E-2 Management structure

Director(s)

*when the director(s) are natural persons*

Name and Surname	Address	Nationality	Voting rights****

*when the director(s) are legal persons*

Registered Name	Registered Address	Nationality	Voting rights****

\*\*\*\* to be completed only if the director(s) have not equal voting rights.

Secretary(ies)

*when the secretary(ies) are natural persons*

Name and Surname	Address	Nationality

*when the secretary(ies) are legal persons*

Registered Name	Registered Address	Nationality

## F. Intermediaries of the seller and/or of the purchaser

### F-1 Intermediaries of the seller or transferor

Note: In case the seller or the transferor uses an intermediary or intermediaries for the sale or transfer of the ownership of the tanker part D should be completed for each involved intermediary and then insert it here.

### F.2 Intermediaries of the purchaser or transferee

Note: In case the purchaser or the transferee uses an intermediary or intermediaries for the purchase or transfer of the ownership of the tanker part E should be completed for each involved intermediary and then insert it here.

2 In support and testimony of the above I attached herewith (please indicate):

A. for the natural person making the notification

- copy of the Identification Document of the natural person

B-1 for a notification made on behalf of a natural person

- copy of the Identification Document of the natural person  
 Documentation attesting the relation with the Seller

B-2 for a notification made on behalf of a legal person

- Certificate of Incorporation of the legal person  
 Certificate of Shareholder(s) of the legal person  
 Certificate of Director(s) of the legal person  
 Certificate of Secretary(s) of the legal person  
 Certificate of Registered address of the legal person



- Certificate of Good Standing of the legal person (as an alternative to the above certificates of the legal person)
  - Note and/or organizational structure diagram explaining, and related documentation detailing, the relation of the legal person with the Seller or transferor
- C. *for the ship*
- Certificate of registry of the ship or Transcript of registry
  - Bill of sale of the ship or other documents attesting the transfer of ownership of the ship
  - Certificate or Protocol of delivery and acceptance of the ship
  - Memorandum of Agreement for the Sale and Purchase of the ship (for notifications tendered on or after 15-Mar-2024)
- D. *for the Seller or transferor*
- Certificate of Incorporation of the Seller or transferor
  - Certificate of Shareholder(s) of the Seller or transferor
  - Certificate of Director(s) of the Seller or transferor
  - Certificate of Secretary(s) of the Seller or transferor
  - Certificate of Registered address of the Seller or transferor
  - Certificate of Good Standing of the Seller or transferor (as an alternative to above the certificates of the Seller or transferor)
  - any related declaration(s) made by the Seller or transferor
- E. *for the Purchaser or transferee*
- Certificate of Incorporation of the Purchaser or transferee
  - Certificate of Shareholder(s) of the Purchaser or transferee
  - Certificate of Director(s) of the Purchaser or transferee
  - Certificate of Secretary(s) of the Purchaser or transferee
  - Certificate of Registered address of the Purchaser or transferee
  - Certificate of Good Standing of the Purchaser or transferee (as an alternative to above the certificates of the Purchaser or transferee)
  - any related declaration(s) made by the Purchaser or transferee
- F-1 *for each intermediary for the Seller or transferor*
- Certificate of Incorporation of intermediary of the Seller or transferor
  - Certificate of Shareholder(s) of intermediary of the Seller or transferor
  - Certificate of Director(s) of intermediary of the Seller or transferor
  - Certificate of Secretary(s) of intermediary of the Seller or transferor
  - Certificate of Registered address of intermediary of the Seller or transferor
  - Certificate of Good Standing of the Seller or transferor (as an alternative to above the certificates of the Seller or transferor)
  - any related declaration(s) made by intermediary of the Seller or transferor
  - Note and/or organizational structure diagram explaining, and related documentation detailing, the relation of the intermediary with the Seller or transferor
- F-2 *for each intermediary of the Purchaser or transferee*
- Certificate of Incorporation of intermediary of the Purchaser or transferee
  - Certificate of Shareholder(s) of intermediary of the Purchaser or transferee
  - Certificate of Director(s) of intermediary of the Purchaser or transferee
  - Certificate of Secretary(s) of intermediary of the Purchaser or transferee
  - Certificate of Registered address of intermediary of the Purch or transferee
  - Certificate of Good Standing of intermediary of the Purchaser or transferee (as an alternative to above the certificates of intermediary of the Purchaser or transferee)
  - any related declaration(s) made by the intermediary of the Purchaser or transferee
  - Note and/or organizational structure diagram explaining, and related documentation detailing, the relation of the intermediary with the Purchaser or transferee

[3]<sup>2</sup> I further declare that:

- (1) the purchaser or transferee is not a natural or legal person, entity or body in Russia;
- (2) the purchaser or transferee is not acting for the benefit of a natural or legal person, entity or body listed in Annex I to Council Regulation (EU) No. 269/2014 or subject to the restrictive measures provided for in Council Regulation (EU) No. 833/2014 as amended;
- (3) the purchaser or transferee has assured the seller or transferor that the tanker will not be used in Russia for the transport, including to ship-to-ship transfer, of crude oil or petroleum products listed in Annex XXV of Council Regulation (EU) No. 833/2014 as amended and originating in, or exported from, Russia in violation of the prohibitions imposed by Articles 3m and 3n of Council Regulation (EU) No. 833/2014 as amended; and
- (4) the seller or transferor has not sold or transfer the ownership of the ship for use of the ship in Russia or for the transport, including to ship-to-ship transfer, of crude oil or petroleum products listed in Annex XXV of Council Regulation (EU) No. 833/2014 as amended and originating in, or exported from, Russia in violation of the prohibitions imposed by Articles 3m and 3n of Council Regulation (EU) No. 833/2014 as amended.]

[3][4] I further declare that I am duly authorised by the said natural or legal person referred under part B to make this solemn declaration for, and on behalf of, the said natural or legal person.

[4][5] I acknowledge that any false or inaccurate statement contained in the present solemn declaration may constitute a criminal offence punishable by virtue of the Cyprus legislation.

[5][6] I make this solemn declaration on the [enter date on which the declaration is made] at [enter place where the declaration is made] conscientiously believing it to be true.

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[Signature of the person making the declaration]

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Made and subscribed by the above-named person on [enter date on which the declaration is made] in the presence of<sup>3</sup>:

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<sup>2</sup> To be included if the notification relates to the sale or transfer of ownership of a tanker which took place on or after 19-Dec-2023.

<sup>3</sup> Declarations must be made before the Registrar of Cyprus Ships, a Court Registrar, Certifying Officer, Notary Public or Cyprus Consular Officer. If is executed outside Cyprus, in case is done before a Notary Public, his/her attestation must be Apostillé or have a Cyprus Consular Officer certification.