



July 22, 2026

To: GE Vernova Global Suppliers

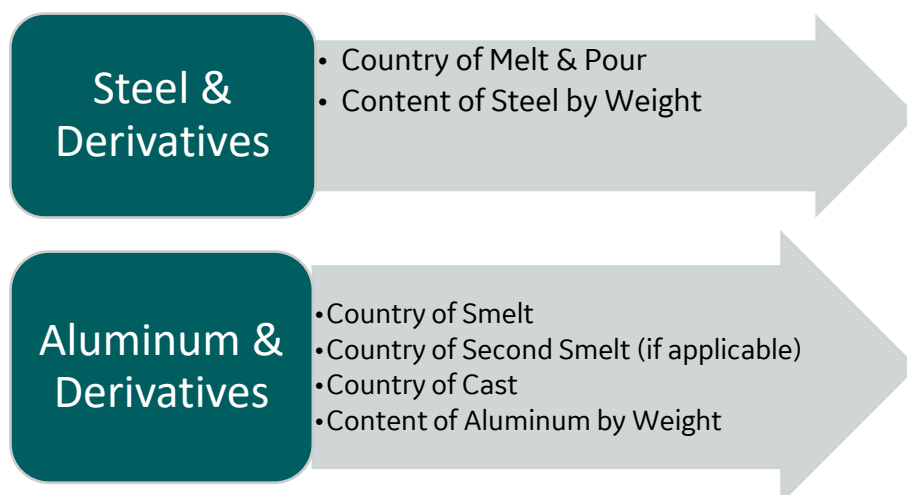
RE: SECTION 232 REQUIREMENTS for Products Containing **Steel, Aluminum, & Copper**

The GE Vernova Way prioritizes innovation, LEAN principles, and serving our customers while promoting mutual success. In keeping with these values, GE Vernova is reissuing our international supplier instructions to enhance the excellence and compliance of our global supply chain.

U.S. Customs and Border Protection (“CBP”) has **updated** the calculation methodology for the Section 232 tariffs on copper, copper derivatives, and steel and aluminum derivatives. This tariff is assessed on products classified with HTS codes categorized by U.S. Customs as primary or derivative forms of steel, aluminum and copper. The rate varies depending on the category, ranging from 15%-50%.

Section 232 regulations require reporting of the steel, aluminum, and copper content and the origin of steel and aluminum for certain imported goods. By law, shipments applicable to Section 232 tariffs and lacking this information will **not be allowed entry** into the U.S. and will be returned to sender. **GE Vernova suppliers are obliged to provide this data for products in scope of Section 232.** **GE Vernova will not be responsible for costs and/or penalties relating to supplier noncompliance. These requirements are incorporated into, and form part of, the applicable purchase order or supply agreement terms between the supplier and GE Vernova, including its affiliates, and suppliers shall reimburse GE Vernova for any duties, penalties, fines, storage fees, redelivery costs, or other costs or delays GE Vernova incurs as a result of a supplier’s failure to timely provide accurate and complete Section 232 data.**

- ❖ The following data must be included on Commercial Invoices for **Section 232 products**:





Copper & Derivatives

- Country of Smelt
- Country of Second Smelt (if applicable)
- Country of Cast
- Content of Copper by Weight

Determination of Products in Scope of Section 232:

Section 232 applicability is determined by HTS classification of a product. Various wind components, including hubs, blades, pitch bearings, main shafts, generators, and many related parts, fall under the Section 232 HTS codes. Some HTS codes are in scope of **both** aluminum and copper or steel Section 232 tariffs and require reporting of each material. Please see determination instructions below.

- ❖ Products in scope of Section 232 that do not contain any steel, aluminum, and/or copper ("SAC") must report zero (0) SAC weight on the itemized invoice to prevent import delays.

Instructions

1. **U.S. Imports:** Compile an itemized list of products being shipped directly to the US.
2. **HTS Code:** Verify the U.S. import classification (HTS code) for each product. If the HTS code is unknown, ask your GEV Sourcing contact.
3. **Section 232 Applicability:** Consult the attached **Section 232 HTS Codes list** to determine which (if any) Section 232 requirements apply.
 - a. Remove the two periods before searching, for example 7413.00.9000 -> 7413009000
4. **Section 232 Determination:** If the HTS code of the specific product is listed in the Section 232 SAC Annex, this means it is in scope and requirements must be followed to ensure import compliance for the materials listed.

Example 1:

1. Part Numbers:

A
PARTCODE
107W5354P002

2. HTS Code:

107W5354P002	GROUND STRaP, 70MMz	SR2021000039	import	US	APPROVED	7413.00.9000
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3. Section 232 Applicability:

HTS	Aluminum	Copper	Steel
7413009000		Copper	



- Section 232 Determination:** Part number 107W5354P002 is classified under the HTS code 7413.00.9000, which is in scope for **Section 232 copper requirements**. The commercial invoice must state the **copper raw material weight**.

Example 2:

1. Part Numbers:

PARTCODE	▼
455W3573G010	

2. HTS Code:

455W3573G010	BLADE,LM62.2P2 GEN D,	SR2025324821	IMPORT	US	APPROVED	8412.90.9070
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3. Section 232 Applicability:

HTS	Aluminum	Copper	Steel
8412909070	Aluminum		Steel

- Section 232 Determination:** Part number 455W3573G010 is classified under the HTS code 8412.90.9070, which is in scope for **Section 232 steel and aluminum requirements**. The supplier's commercial invoice must clearly state the **steel material weight, country of melt & pour and the aluminum material weight, and countries of smelt & cast**.

Exemptions:

- ❖ Iron content (iron castings, etc.) is exempt.
- ❖ Temporary imports (warranty repairs, prototypes for testing, etc.) are exempt if under special provisions (TIB or Carnet).
- ❖ Fixtures imported as Instruments of International Traffic (IITs) are exempt.

Dual/Multi-Sourced Materials:

Some suppliers may purchase SAC materials from multiple sources. Suppliers are expected to determine an accurate **total combined material content per part** from **all** sources. Only **one** (1) Country of Melt and Pour (Steel) or Primary & Secondary Smelt/Second Smelt and Cast (Aluminum) may be provided. Suppliers may utilize standardized accounting practices, such as FIFO, to determine the correct country (or majority country) and must maintain documentation supporting their methodology and available for audit, if validation is requested.

SAC Data Reporting on Invoices:

Supplier invoices must clearly detail the aggregate weight and origin of the Section 232 SAC content **per part** in relation to the weight of the entire product. This data may be reported on the invoice in any format. Suppliers must retain documentation supporting the accuracy of the reported SAC content and origin information and must make it available to GE Vernova promptly upon request for audit or verification purposes. See example below and attached:

SAC Data Example:

		Steel		Aluminum				Copper			
Part number	Part Unit Weight/kg	Country of Melt/Pour	Unit Steel Weight	Country of Primary Smelt	Country of 2nd Smelt	Country of Cast	Unit Aluminum Weight	Country of Primary Smelt	Country of 2nd Smelt	Country of Cast	Unit Copper Weight

General Supplier Requirements for US Imports

Please comply with the following requirements for all international shipments destined for GE Vernova imports into the United States.

1. **Timely Notification**
 - Please ensure that your GE Vernova Sourcing contacts are notified of **shipment *prior to export*** to avoid costly import clearance delays.
2. **Correct Shipment Documentation**
 - All documentation must be accurate, complete, and compliant. It is important to include the **GE Vernova Part Numbers, net weight per piece, and validated Country of Origin** (country of manufacture) for each product.
 - Please refer to the **GE Vernova U.S. Import Documentation Checklist** (attached) for comprehensive documentation instructions.
3. **Courier/Parcel Shipments (FedEx, UPS, DHL)**
 - To support timely importation of small package shipments, a shipment notification is required. The email should include - tracking number, importer/consignee (GE Vernova legal entity name and address), commercial documents (i.e. commercial invoice, packing list, country of origin certificate) and GE Vernova Sourcing contact email. Each courier has a dedicated team supporting customs clearance activities, each has a different email address for the shipment notification. Your GE Vernova Sourcing contact can provide the courier contact information.

Please follow up with your GE Vernova Sourcing contacts regarding any questions or concerns.

For questions regarding customs regulations, please consult your internal customs compliance team for additional support. For questions regarding this supplier memo summarizing Section 232 tariff requirements, please direct inquiries to - NAMWindCustoms@gevernova.com



GE VERNOVA

Thank you in advance for your support of these important regulatory obligations and your committed partnership to compliance.

This memo is provided for general informational purposes only to summarize certain Section 232 tariff-related requirements and does not constitute legal, customs, or trade compliance advice. Section 232 tariff rates, HTS classifications, and related U.S. Customs and Border Protection guidance are subject to change, and this memo may not reflect the most current requirements at any given time. Each supplier remains solely responsible for independently verifying the applicable HTS classification, tariff treatment, and reporting requirements for its products, including by consulting its own qualified customs or trade counsel, and for ensuring its own compliance with all applicable laws and regulations.