



**FEBRUARY 10, 2015**

**CIRCULAR NO. 10/15**

**TO MEMBERS OF THE ASSOCIATION**

**Dear Member:**

**PRE-EMPLOYMENT MEDICAL EXAMINATION (PEME) PROGRAM UPDATE: EFFECT OF SANCTIONS ON PEME CLINICS IN THE CRIMEA – SEVASTAPOL AND KERCH**

Members are asked to note that current US economic sanctions prohibit the American Club from providing cover, or other support, for trade with the Crimea region of Ukraine unless authorized by the US Treasury Department. It should also be noted that the European Union has equally applied sanctions in regard to trade with Crimea.

There exists a general Treasury Department license authorizing the exportation or re-exportation, from the United States or by a US person, wherever located, of agricultural commodities, medicine, and medical supplies to Crimea, or to persons in third countries purchasing specifically for resale to Crimea, and the conduct of related transactions, including the making of shipping and cargo inspection arrangements, the obtaining of insurance, the arrangement of financing and payment, shipping of the goods, receipt of payment, and the entry into contracts (including executory contracts).

However, the current sanctions with respect to Crimea, among other things, prohibit the American Club from facilitating the provision of services by PEME clinics in Sevastopol and Kerch, which were previously approved by the Club. The US sanctions, however, do not prohibit the American Club's non-US person Members from independently and directly dealing with those clinics.

Given the US, as well as EU, sanctions with respect to the current circumstances involving Ukraine, Members are urged to conduct due diligence to determine what sanctions prohibitions may apply to their activities there.

If Members have any questions, they should feel free to contact Mr. Charles Cuccia, Senior Vice President at +1 212 847 4539 or by e-mail at [charles.cuccia@american-club.com](mailto:charles.cuccia@american-club.com).

Yours faithfully,



Joseph E.M. Hughes, Chairman & CEO  
Shipowners Claims Bureau, Inc., Managers for  
**THE AMERICAN CLUB**