

Onderwerp: Re: (RUS-UKR) Request for comment – STM components found in Russian drones
Datum: dinsdag 28 oktober 2025 om 11:34:47 Midden-Europese standaardtijd
Van: Marcia Nieuwenhuis
Aan: Ronan MULVANEY
Bijlagen: image001.png, image002.png, image003.png, image004.png, image005.png, image006.png, image007.png

Dear Mr Mulvaney,

Thank you for your email. Could it be that something went wrong? I had asked ten questions, but I see that most of them remain unanswered. We would like to make an accurate reconstruction of how it is possible that STM chips have ended up in Russian weapons.

Am I correct if I assume that when STM learned that its components were found in Russian attack drones, an immediate investigation was conducted to determine through which supplier this might have happened — also to ensure that this route cannot be used again?

I would kindly ask that you provide an answer to this question as well as the ten listed question below by tomorrow at 10:00 a.m., rather than a general statement. In our reporting, we will also mention how you did or did not respond to our questions, for instance by including the questions and answers as an appendix to our accountability section. We would also like to know whether you are willing to provide an on-camera explanation.

Kind regards,

Marcia Nieuwenhuis

Van: Ronan MULVANEY <ronan.mulvaney@st.com>
Verzonden: maandag, oktober 27, 2025 9:33 AM
Aan: Marcia Nieuwenhuis <Marcia.Nieuwenhuis@rtl.nl>
CC: Alexis BRETON <alexis.breton@st.com>

Onderwerp: RE: (RUS-UKR) Request for comment – STM components found in Russian drones

Dear Ms. Nieuwenhuis,

Thank you for contacting us. Here is what we can tell you:

ST is an integrated device manufacturer. We work with more than 200,000 customers and thousands of partners around the world. We do not authorize nor condone the use of our products outside of their intended purpose.

We have a comprehensive global trade compliance program through which we comply with all international trade rules and regulations. We have an internal export control compliance program that contains training and procedures to assure compliance with various export controls regulations. As part of that program, we provide guidelines to our sales channels to assure each party in our supply chain understands its responsibility to comply with applicable laws and regulations. We also collaborate and exchange information with third parties undertaking field research efforts as well as various government and non-government organizations.

Since the end of February 2022, we have taken actions to comply with the specific requirements of multiple sanction packages and export control measures implemented by the European Union, the United States, and partnering countries against Russia and Belarus. These actions include reinforcing the compliance requirements for all our sales channels - including vigilance against sanction evasion and shipping diversion, implementing additional end user screening measures, deploying automated solutions for customers and product checks, and enhancing our awareness communication to targeted stakeholders.

We no longer have operations in Russia.

With best regards,
Ronan Mulvaney



Ronan MULVANEY | Tel: +33 1 58 07 77 23 | Mobile: +33 7 64 50 58 37
Corporate External Communications Director

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From: Marcia Nieuwenhuis <Marcia.Nieuwenhuis@rtl.nl>
Sent: Friday, October 24, 2025 2:19 PM
To: Alexis BRETON <alexis.breton@st.com>
Subject: Request for comment – STM components found in Russian drones

Dear Mr Breton, dear Media Relations team,

My name is **Marcia Nieuwenhuis**, and I am an investigative journalist with **RTL Nieuws** in the Netherlands.

For an ongoing investigation into the presence of Western-made technology in Russian weapons systems, we have identified several

STMicroelectronics components reportedly found in drones and other military systems used by the Russian armed forces. Our analysis shows that multiple items attributed to STMicroelectronics have **recent production dates**, including **components produced after February 24, 2022**, when export restrictions on dual-use technologies to Russia were significantly tightened.

This indicates that, despite these sanctions — which explicitly prohibit such products from being exported to, or ending up in, Russia **directly or indirectly** — the sanctions mechanisms have **not been fully effective in practice**, or **circumvention routes** may persist through third countries or intermediaries.

According to our dataset, we identified **227 components** attributed to STMicroelectronics. Of the items with known production dates (**25** in total), **17** were produced **after 24 February 2022**.

In light of the above, we would appreciate your responses to the following questions:

1. **Verification:** Does STMicroelectronics recognise the specific component types and markings listed in the attached file? Are these indeed STMicroelectronics products?
2. **Explanation:** How does STMicroelectronics explain that components with recent production dates appear to have been found in Russian drones and other systems despite EU and international sanctions?
3. **Traceability:** Does STMicroelectronics maintain product traceability after the point of sale (e.g., batch/serial tracking)? If not, does ST consider this a limitation in enforcing export-control compliance?
4. **Chain visibility:** Does ST have insight into which distributors or intermediaries may have supplied these components — directly or indirectly — to Russia?
5. **Distributors:** How many distributors does ST currently work with globally, and have any been suspended or terminated due to sanctions-compliance concerns? If so, how many?
6. **Compliance measures (since 2014):** What export-control and compliance measures has ST implemented since 2014 to prevent its products from ending up in Russia or in military applications?
7. **Post-Feb 2022 changes:** Have these measures been strengthened or modified since February 2022? Please specify how.
8. **Data signals:** Has ST detected any changes in sales or distribution data that could indicate altered supply routes or new types of buyers (e.g., bulk purchases by trading/import-export companies)? Are ST's compliance measures focused on identifying such risks?
9. **Cooperation with authorities:** Is ST cooperating with European or national authorities (e.g., in the EU, including the Netherlands) to monitor or prevent potential re-exports through third countries (such as Hong Kong, Turkey, Cyprus, or the UAE)?
10. **Effectiveness of the framework:** In light of these findings, does ST consider that the current export-control/sanctions framework requires **strengthening** or

improved enforcement?

Attachment:

- *STMicroelectronics_Components.xlsx* — a list of STMicroelectronics components identified in Russian drones and weapons systems. The workbook includes:
 - **Without_ProdDate:** components **without** a production date in the public dataset (please verify or provide manufacturing dates or approximate production periods for these items, and indicate how many are from after the invasion).
 - **With_ProdDate:** components **with** known production dates (for reference).

We intend to include STMicroelectronics' response in our reporting. Could you please reply by **Monday, 27 October, 18:00 CET**?

Thank you in advance for your time and cooperation.

Kind regards,

Marcia Nieuwenhuis

**Marcia
Nieuwenhuis**

Investigative journalist
RTL Nieuws

+31 614948531

marcia.nieuwenhuis@rtl.nl

X: [@m_nieuwenhuis](#)

LinkedIn: [marcianieuwenhuis](#)

Instagram: [marcianieuwenhuis](#)



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rtl.nl

RTL Nederland BV, KvK 32105893 Hilversum

RTL Nieuws BV, KvK 80415997 Hilversum

Videoland BV, KvK 17279203 Hilversum

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