

Category	Actors	Requirement to be afforded safe harbor	Examples of information or documentation	Recommendations for risk-based measures for Compliance
Tier 1 — Actors with direct access to price information	Commodities brokers/traders	Retain price information and provide information/ attestation to Tier 2 or Tier 3, as needed	Invoices, contracts, receipts/proof of payment	Updating terms and conditions of contracts, updating invoice structure to include itemized price for oil purchase (excluding shipping, freight, customs, and insurance costs), providing guidance to staff
Tier 2 — Actors sometimes able to request price information	Financial institutions providing trade finance, customs brokers, ship/vessel agents	Request and retain price information (to the extent practicable) or attestation from Tier 1 or customer/ counterparty (when direct receipt of price information is not practicable)	Invoices, contracts, receipts/proof of payment; price cap attestation	Providing guidance to trade finance department/ relationship managers/ compliance staff, updating requests for information (RFIs) or sanctions questionnaire templates
Tier 3 — Actors without direct access to price information	Insurers, reinsurers, P&I clubs, ship owners /carriers, flagging registries	Receive attestation from Tier 1 or Tier 2 or customer/ counterparty regarding compliance with the price cap	Sanctions exclusion clause within policy, clause within policy that excludes coverage for activities related to the maritime transport of Russian oil purchased above the price cap, price cap attestation	Updating policies and terms and conditions, providing guidance to staff