



RECIPROCAL TARIFFS REMINDER (April 3, 2025)

Clients are reminded that yesterday's [Executive Order](#) on reciprocal tariffs includes [Annex II](#), which lists 1,039 HTSUS tariff provisions that are not subject to the reciprocal tariffs. Note that Annex II does not list all HTSUS provisions which are currently exempt from the reciprocal tariffs, such as Section 232 steel and aluminum articles and Section 232 automobiles and automobile parts.

We urge clients to validate whether their imports are included on Annex II. Annex II includes some surprising HTSUS classifications, including tariff provisions covering certain petroleum products, chemicals, metals, fertilizers, transistors, and electronic integrated circuits. Some of the exempted products will later be the subject of specific "sectoral" reciprocal tariffs, such as copper, pharmaceuticals, semiconductors, and lumber.

We expect that Annex III, which is referenced in Annex II, will be published soon and include specific HTSUS language on the reciprocal tariffs and their exemptions.

Please contact [Marshall Miller](#), [Brian Murphy](#), [Sean Murray](#), or [David Ostheimer](#) with questions.

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