## Exens solutions Export and Re-Export Country Chart



Any queries on this list must be referred to:

BU Commercial, Contracts & Legal Lead.

| Country  | Exens Solutions POLICY  |                                      | Information<br>US Regulations  |                  |
|--|---|--------------------------------------|--|------------------|
|  | Civil   | Military                             | Civil  | Military         |
| Knowledge, suspicion or dis-quiet that any product or<br>service may be used for any <b>weapon of mass</b><br>destruction or purpose   | ESCALATION / APPROVAL NEEDED<br>IRRESPECTIVE OF SITE LOCATION |                                      | WMD end-use<br>prohibitions apply<br>even to civili items<br>See 15CFR Part744 |                  |
| Knowledge, suspicion or dis-quiet that any product or service may be used for any <b>missile</b> purpose   |   |                                      |  |                  |
| ITAR controlled products require a licence or exception for<br>export from the U.S. and re-export from another<br>jurisdiction   |   |                                      | N/A  |                  |
| ITAR-controlled defense services (including assistance,<br>training, and providing technical data) requires a license,<br>agreement, or exemption. Generally applies to both U.S.<br>and non-U.S. items. |   |                                      | N/A  |                  |
| Afghanistan  |   |                                      |  |                  |
| Argentina  |   |                                      |  |                  |
| Armenia<br>Azerbaijan  |   |                                      |  |                  |
| Bahrain  |   |                                      |  |                  |
| Belarus  |   | No sales allowed                     |  | No sales allowed |
| Benin  |   |                                      |  |                  |
| Bosnia and Herzegovina   |   |                                      |  |                  |
| Burkina Faso   |   |                                      |  |                  |
| Burma (Myanmar)<br>Burundi   |   |                                      |  |                  |
| Cambodia   |   |                                      |  |                  |
| Cape Verde   |   |                                      |  |                  |
| Central African Republic   |   |                                      |  |                  |
| China  |   |                                      |  |                  |
| China (Hong Kong)  |   |                                      |  |                  |
| China (Macau)  |   |                                      |  |                  |
| Congo (Dem. Rep.)<br>Cote d'Ivoire (Ivory Coast)   |   |                                      |  |                  |
|  | Nega  |                                      | Ne este  | a allowed        |
| Cuba   | NO SA   | es allowed                           | NO Sale  | es allowed       |
| Cyprus   |   |                                      |  |                  |
| Egypt  |   |                                      |  |                  |
| Eritrea  |   |                                      |  |                  |
| Fiji   | L   |                                      |  |                  |
| Gambia   |   |                                      |  |                  |
| Georgia  |   |                                      |  |                  |
| Ghana<br>Republic of Guinea  |   |                                      |  |                  |
| Guinea-Bissau  |   |                                      |  |                  |
| Haiti  |   |                                      |  |                  |
| Hong Kong - see China (Hong Kong)  |   |                                      |  |                  |
| India  |   | lear Only                            |  |                  |
| Iran   | No sa   | es allowed                           | No sale  | es allowed       |
| Iraq   |   |                                      |  |                  |
| Israel   |   |                                      |  |                  |
| Jordon<br>Kazakhstan   |   |                                      |  |                  |
| Kazakhstan<br>Kuwait   |   |                                      |  |                  |
| Kyrgyzstan   |   |                                      |  |                  |
| Laos   |   |                                      |  |                  |
| Lebanon  |   | UN Arms embargo. No sales<br>allowed |  |                  |

|   | UN Arms embargo. No sales   |  |  |  |
|---|---|--|--|--|
| Liberia   | allowed UN Arms embargo. No sales   |  |  |  |
| Libya   | allowed   |  |  |  |
| Macau - see China (Macau)                       |   |  |  |  |
| Mali  |   |  |  |  |
| Moldova   |   |  |  |  |
| Mongolia  |   |  |  |  |
| Montenegro                                      |   |  |  |  |
| Niger<br>Nigeria                                |   |  |  |  |
| North Korea                                     | No sales allowed No sales allowed   |  |  |  |
| Oman  | Nuclear Only  |  |  |  |
| Pakistan  |   |  |  |  |
|   |   |  |  |  |
| Qatar   |   |  |  |  |
| Russia  |   |  |  |  |
| Rwanda  |   |  |  |  |
| Saudi Arabia                                    |   |  |  |  |
| Senegal   |   |  |  |  |
| Sierra Leone                                    |   |  |  |  |
| Somalia   |   |  |  |  |
| Sri Lanka                                       |   |  |  |  |
| Sudan   |   |  |  |  |
| South Sudan                                     |   |  |  |  |
| Syria   | No sales allowed No sales allowed   |  |  |  |
| Tajikstan                                       |   |  |  |  |
| Togo  |   |  |  |  |
| Tunesia   |   |  |  |  |
| Turkey  |   |  |  |  |
| Turkmenistan                                    |   |  |  |  |
| UAE   |   |  |  |  |
| Ukraine (excluding Crimea)                      |   |  |  |  |
| Ukraine ( Crimea region)                        |   |  |  |  |
| Venezuela<br>Vietnam                            |   |  |  |  |
| Vietnam<br>Yemen                                |   |  |  |  |
| Zimbabwe  |   |  |  |  |
|   |   |  |  |  |
| Exens solutions POLICY ON MILITARY USE / GOODS: | <ol> <li>No Exens solutions company may enter into military (including dual use) sales, service or activity with countries the subject of a<br/>current US arms embargo or specifically contrary to law or regulation (e.g., § 744.17 Restrictions on certain exports and reexports of<br/>general purposes microprocessors for "military end -uses" and to "military end-users", § 744.21 Restrictions on certain military end-uses<br/>in the PRC).</li> <li>Knowledge, suspicion or dis-quiet that any product or service "may" be used for any weapon of mass destruction or missile purpose<br/>must be escalated immediately</li> </ol> |  |  |  |
| "Military" definition:                          | Commodities, products and/or services that are either:<br>(1) specifically designed or modified for military end use;<br>(2) installed in military applications/vehicles; or<br>(3) are otherwise going to be used by the military<br>Military List<br>(5) EAR-controlled items classified under ECCN 9x515   |  |  |  |
| "Civil" definition:                             | Commercial commodities or services only that are not "Military" (as defined above).   |  |  |  |
| No sales allowed                                | As a result of the U.S. governments' position on trade with these countires generally, but particularly in relation to military equipment, it is<br>Exens's solutions policy not to participate in direct or indirect sales involving these countries.  |  |  |  |
|   | Embargoes/highly complex restrictions in place. Escalate to BU Commercial, Contracts & Legal Lead.  |  |  |  |
|   | Restrictions in place. Seek advice from local Empowered Official or escalate to BU Commercial, Contracts & Legal Lead. before proceeding.   |  |  |  |

| Important Note:  | No escalation required on Export grounds. May still require escalation if it triggers other criteria e.g. Limit of Liability, transfer of IPR, very high value, etc. This guidance note does not negate BU's need to comply with local export regulations and procedures. This spreadsheet is accurate as of the above issue date but is subject to change. Sanctions and restrictions change regularly.  |
|------------------|---|
| Brokering:       | Please note that Exens solutions does not have to be trading itself to be caught by a jurisdiction's trade law and regulations. Any person who acts as an agent for others in negotiating or arranging contracts, purchases, sales or transfers of US defence articles or defence services in return for a fee, commission or other consideration is required under 22 CFR Part 129 to be registered with the US Department of State.   |
| OFAC's 50% Rule: | Under the U.S. sanctions regime, if an entity is owned in the aggregate, directly or indirectly, 50% or more by one or more blocked<br>persons (such as individuals or entities on OFAC's Specially Designated Nationals (SDN) list), that entity is itself automatically blocked,<br>regardless of whether or not it appears on OFAC's SDN list. OFAC's 50% rule is generally about ownership, not control. However, please<br>note that OFAC sanctions also broadly prohibit transactions involving, directly or indirectly, a blocked individual, even if the blocked<br>individual is acting on behalf of a non-blocked entity. Therefore, U.S. persons should be careful when conducting business with non-<br>blocked entities in which blocked individuals are involved; U.S. persons may not, for example, enter into contracts that are signed by a<br>blocked individual. |