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 US Regulations	
	Civil	Military	Civil	Military
Knowledge, suspicion or dis-quiet that any product or service may be used for any weapon of mass destruction or purpose	ESCALATION / APPROVAL NEEDED IRRESPECTIVE OF SITE LOCATION		WMD end-use prohibitions apply even to civili items See 15CFR Part744	
Knowledge, suspicion or dis-quiet that any product or service may be used for any missile purpose				
ITAR controlled products require a licence or exception for export from the U.S. and re-export from another jurisdiction			N/A	
ITAR-controlled defense services (including assistance, training, and providing technical data) requires a license, agreement, or exemption. Generally applies to both U.S. and non-U.S. items.			N/A	
Afghanistan				
Argentina				
Armenia Azerbaijan				
Bahrain				
Belarus		No sales allowed		No sales allowed
Benin				
Bosnia and Herzegovina				
Burkina Faso				
Burma (Myanmar) Burundi				
Cambodia				
Cape Verde				
Central African Republic				
China				
China (Hong Kong)				
China (Macau)				
Congo (Dem. Rep.) 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 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 Kazakhstan				
Kazakhstan Kuwait				
Kyrgyzstan				
Laos				
Lebanon		UN Arms embargo. No sales allowed		

	UN Arms embargo. No sales			
Liberia	allowed UN Arms embargo. No sales			
Libya	allowed			
Macau - see China (Macau)				
Mali				
Moldova				
Mongolia				
Montenegro				
Niger 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 Vietnam				
Vietnam Yemen				
Zimbabwe				
Exens solutions POLICY ON MILITARY USE / GOODS:	 No Exens solutions company may enter into military (including dual use) sales, service or activity with countries the subject of a current US arms embargo or specifically contrary to law or regulation (e.g., § 744.17 Restrictions on certain exports and reexports of general purposes microprocessors for "military end -uses" and to "military end-users", § 744.21 Restrictions on certain military end-uses in the PRC). Knowledge, suspicion or dis-quiet that any product or service "may" be used for any weapon of mass destruction or missile purpose must be escalated immediately 			
"Military" definition:	Commodities, products and/or services that are either: (1) specifically designed or modified for military end use; (2) installed in military applications/vehicles; or (3) are otherwise going to be used by the military Military List (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 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 persons (such as individuals or entities on OFAC's Specially Designated Nationals (SDN) list), that entity is itself automatically blocked, regardless of whether or not it appears on OFAC's SDN list. OFAC's 50% rule is generally about ownership, not control. However, please note that OFAC sanctions also broadly prohibit transactions involving, directly or indirectly, a blocked individual, even if the blocked individual is acting on behalf of a non-blocked entity. Therefore, U.S. persons should be careful when conducting business with non- blocked entities in which blocked individuals are involved; U.S. persons may not, for example, enter into contracts that are signed by a blocked individual.