

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 disquiet 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 civil items See 15CFR Part744	
Knowledge, suspicion or disquiet 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)				
Cuba	No sales allowed		No sales allowed	
Cyprus				
Egypt				
Eritrea				
Fiji				
Gambia				
Georgia				
Ghana				
Republic of Guinea				
Guinea-Bissau				
Haiti				
Hong Kong - see China (Hong Kong)				
India	Nuclear Only			
Iran	No sales allowed		No sales allowed	
Iraq				
Israel				
Jordan				
Kazakhstan				
Kuwait				
Kyrgyzstan				
Laos				
Lebanon		UN Arms embargo. No sales allowed		

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.

Important Note: **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.

