

### Cobham NA Export and Re-Export Country Chart

Any queries on this list must be referred to: **Director, Global Trade Compliance**

Country	Cobham NA POLICY		Information US Regulations	
	Civil	Military	Civil	Military
Knowledge, suspicion or disquiet that any product or service may be used for any <b>weapon of mass destruction</b> or purpose	<b>ESCALATION / APPROVAL NEEDED IRRESPECTIVE OF BU LOCATION</b>		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 <b>missile</b> purpose				
<b>ITAR</b> controlled products require a licence or exception for export from the U.S. and re-export from another jurisdiction			N/A	
<b>ITAR</b> -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	
<b>Afghanistan</b>				
<b>Argentina</b>				
<b>Armenia</b>				
<b>Azerbaijan</b>				
<b>Bahrain</b>				
<b>Belarus</b>		No sales allowed		No sales allowed
<b>Benin</b>				
<b>Bosnia and Herzegovina</b>				
<b>Burkina Faso</b>				
<b>Burma (Myanmar)</b>				
<b>Burundi</b>				
<b>Cambodia</b>				
<b>Cape Verde</b>				
<b>Central African Republic</b>				
<b>China</b>				
<b>China (Hong Kong)</b>				
<b>China (Macau)</b>				
<b>Congo (Dem. Rep.)</b>				
<b>Cote d'Ivoire (Ivory Coast)</b>				
<b>Cuba</b>	No sales allowed		No sales allowed	
<b>Cyprus</b>				
<b>Egypt</b>				
<b>Eritrea</b>				
<b>Fiji</b>				
<b>Gambia</b>				
<b>Georgia</b>				
<b>Ghana</b>				
<b>Republic of Guinea</b>				
<b>Guinea-Bissau</b>				
<b>Haiti</b>				
<b>Hong Kong - see China (Hong Kong)</b>				
<b>India</b>	Nuclear Only			
<b>Iran</b>	No sales allowed		No sales allowed	
<b>Iraq</b>				
<b>Israel</b>				
<b>Jordan</b>				
<b>Kazakhstan</b>				

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Restrictions in place. **Seek advice from local Empowered Official or escalate to Export Compliance Manager before proceeding.**

**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 Cobham 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.

**Please note that customers must also comply with the Policy and Guidance:**

**Trade Compliance US Brokering - ITAR**

**Potential Penalties: \$1,000,000 and 10 years imprisonment, debarment**

**A "broker" is anyone who acts as an agent for others in negotiating or arranging contracts, purchases, sales or transfers of defense articles or defense services in return for a fee, commission or other consideration. It includes: the financing, transportation, freight forwarding or taking of any other action that facilitates the manufacture, export, import, or transfer of a defense article or service irrespective of its origin. This does not include: activities by U.S. persons that are limited exclusively to U.S. domestic sales or transfers, and persons exclusively in the business of financing, transporting, or freight forwarding, whose business activities do not also include brokering defense articles or defense services. Brokers must register with US Department of State and also provide an annual report to the U.S. government enumerating and describing its brokering activities and any exemptions used for other covered activities.**

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**Trade Compliance US Brokering - ITAR**

**1 Determine if goods are ITAR controlled** – consult Cobham Empowered Official

**2 Identify Brokers** e.g. advisors, dealers, service agents, Cobham sales staff.

**3 Brokers to seek registration from US Government** – No sales to proceed until registered

**4 Receive Copy of Registration letter or certification of registration from Broker Or Do not Proceed**

**5 File registration with Division**

**More information:**

- US Dept of State DOTC Registration Pages: <http://www.pmofc.state.gov/regstrat/aj/ajnote.x.html>
- ITAR Part 129 Regulations – Brokers: [http://www.pmofc.state.gov/regulations laws/documents/official\\_itar/ITAR\\_Part\\_129.pdf](http://www.pmofc.state.gov/regulations laws/documents/official_itar/ITAR_Part_129.pdf)

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# US sanctions target groupings

<b>Comprehensively Sanctioned Territories</b>	Crimea, Cuba, Iran, North Korea, Syria
<b>Significant Sanctions</b>	Russia, Venezuela,
<b>Limited Sanctions</b>	W. Balkans, Belarus, Burundi, Central African Republic, DR Congo, Iraq, Lebanon, Libya, Nicaragua, Somalia, South Sudan, Ukraine, Yemen, Zimbabwe, Eritrea, Sudan
<b>Restricted Persons</b>	<ul style="list-style-type: none"><li>■ Specially Designated Nationals ("SDNs")</li><li>■ Terrorists, WMD proliferators, human rights violators, malicious cyber-related activities, transnational criminal organizations, narcotics traffickers, Magnitsky, rough diamonds, etc.</li><li>■ Foreign Sanctions Evaders, Sectoral Sanctions Entities</li></ul>