Cobham NA Export and Re-Export Country Chart

Any queries on this list must be referred to:

Director, Global Trade Compliance

COBHAM

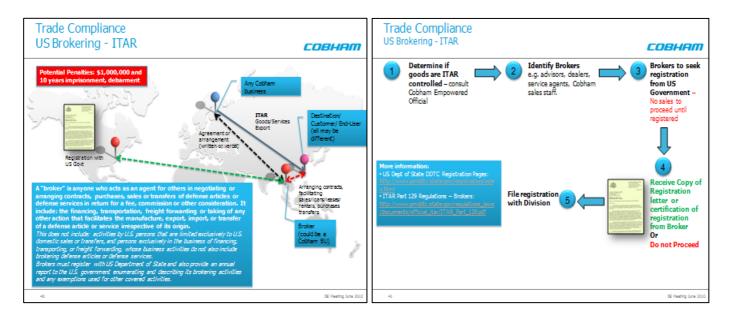
v1 March, 2020

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	Terms		
COBHAM POLICY ON MILITARY USE / GOODS:	a current US arms embargo or specificall and reexports of general purposes microp Restrictions on certain military end-uses i	any product or service "may" be used for any w	Restrictions on certain exports itary end-users", § 744.21
"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 UK Military List 9x515 (4) described on the ITAR or (5) EAR-controlled items classified under ECCN		
"Civil" definition:	Commercial commodities or services only that are not "Military" (as defined above).		
No sales allowed		on on trade with these countires generally, but not to participate in direct or indirect sales in	
	Embargoes/highly complex restrictions in	n place. Escalate to Export Compliance M	anager or Director, GTC.

	Restrictions in place. Seek advice from local Empowered Official <u>or</u> escalate to Ecport 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:



US sanctions target groupings

Comprehensively Sanctioned Territories	Crimea, Cuba, Iran, North Korea, Syria
, Significant Sanctions	Russia, Venezuela,
, Limited Sanctions	W. Balkans, Belarus, Burundi, Central African Republic, DR Congo, Iraq, Lebanon, Libya, Nicaragua, Somalia, South Sudan, Ukraine, Yemen, Zimbabwe, Eritrea, Sudan
, Restricted Persons	 Specially Designated Nationals ("SDNs") Terrorists, WMD proliferators, human rights violators, malicious cyber-related activities, transnational criminal organizations, narcotics traffickers, Magnitsky, rough diamonds, etc. Foreign Sanctions Evaders, Sectoral Sanctions Entities