

# Export and Re-Export Country Policy

Any queries on this list must be referred to: *Export Official of the supplying Cobham business*

Country	COBHAM POLICY	
	Civil	Military
	Commercial commodities or services only that are not "Military" (as defined above) or otherwise restricted by ITAR, EAR or UK Military list	Commodities and services that are either: (1) military items - specifically designed or modified for military end use or installed in military applications/vehicles; or (2) are otherwise going to be used by the military
	<b>ESCALATION / APPROVAL NEEDED IRRESPECTIVE OF BU LOCATION</b>	
Knowledge, suspicion or disquiet that any product or service may be used for any <b>weapon of mass destruction or missile purpose</b>		
UK law requires licences for exports of <b>Military items/services</b> from the UK and between non-UK destinations irrespective of the relevant BU's location where a UK person or person carrying out activities in the UK does anything to facilitate, support or in any way involved in their supply or delivery between such non-UK destinations (incl if the BU GM or leadership team etc		
<b>ITAR</b> controlled products require a licence for export from the U.S. and re-export from another jurisdiction		
Afghanistan		
Argentina		
Armenia		<b>No Sales Allowed</b>
Azerbaijan		
Belarus		
Benin		
Bosnia and Herzegovina		
Burkina Faso		
Burma (Myanmar)		
Cape Verde		
Central African Republic		
China		
Congo (Dem. Rep.)		
Cote d'Ivoire (Ivory Coast)		
Cuba		
Cyprus		
Egypt		
Eritrea		
Fiji		
Gambia		
Ghana		
Guinea		
Guinea-Bissau		
Haiti		
Hong Kong		
India		<b>Nuclear Only</b>
Iran (embargoed 'terrorist' state)		<b>No Sales Allowed</b>
Iraq		
Kyrgyzstan		
Lebanon		
Liberia		
Libya		
Mali		
Moldova		
Montenegro		
Niger		
Nigeria		
North Korea (embargoed 'terrorist' state)		<b>No Sales Allowed</b>
Pakistan		
Russia		

Rwanda		
Senegal		
Serbia		
Sierra Leone		
Somalia		
Sri Lanka		
Sudan (embargoed 'terrorist' state)	<b>No Sales Allowed</b>	
South Sudan	<b>No Sales Allowed</b>	
Syria (embargoed 'terrorist' state)	<b>No Sales Allowed</b>	
Taiwan		
Togo		
Venezuela		
Vietnam		
Yemen		
Zimbabwe		

**Please note this data is provided as guidance only and is subject to change without notice. Dealers should at all times consult the latest US, EU, UK, UN and other applicable export control restrictions.**

**Terms**

**COBHAM POLICY ON MILITARY USE / GOODS:**

- 1) No Cobham company may enter into military (including dual use) sales, service or activity with countries the subject of a current UK or US arms embargo or specifically contrary to US or UK law or regulation (e.g., § 744.17 Restrictions on certain exports and reexports of general purposes microprocessors for "military end -uuses" and to "military end-users", § 744.21 Restrictions on certain military end-uses in the PRC).
- 2) 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

**Cobham Policy**


Embargos in place. **Escalate to Export Official of the supplying Cobham business before proceeding.**

UK Brokering Restrictions in place. **Escalate to Export Official of the supplying Cobham business before proceeding.**

Restrictions in place. **Seek advice from Export Official of the supplying Cobham business before proceeding.**

**No escalation required on Export grounds.**

**Important Note:**

This does not negate your 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. In the UK, facilitating or arranging trade of Military items between two third countries (even within the EU) will require a licence and may be sufficient to trigger rules in some other jurisdictions. Additionally, EU law restricts persons in the EU from facilitating or arranging trade of some dual use items (i.e. civil items with a potentially military application) between non-EU countries, where there are concerns about weapons of mass destruction end use.

Further, any person who acts as an agent for others in negotiating or arranging contracts, purchases, sales or transfers of US defense articles or defense 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.