Trade Compliance Questionnaire

Will any of the products or services purchased from Ingram Micro be exported from or imported into a country outside the European Union\*? € Yes € No

If “No“: please read the Trade Compliance Information Sheet below and sign the acknowledgment

(Completing the Trade Compliance Questionnaire below is not mandatory if your answer is “No”.)

If “Yes“: please complete the Trade Compliance Questionnaire below

\*The EU countries are Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Slovakia, Slovenia, Spain, Sweden, and United Kingdom.

About this Trade Compliance Questionnaire:

As a subsidiary of Ingram Micro, Inc. a US corporation, we are obliged to comply with all applicable U.S., E.U. and local country export and trade regulations. For this reason Ingram Micro has developed this Trade Compliance Questionnaire and is requiring all our customers to answer some basic questions concerning their export and import activities. We ask you to answer all questions in a legible manner, truthfully, completely, and not to use any abbreviations. Only in this way can we ensure that your new customer request can be handled by us promptly and properly.

1. Please list the names of all the non-EU countries where you intend to export to or import into, or market and resell the products/services purchased from Ingram Micro:

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1. Do you intend to resell Ingram Micro products/services to any government agencies in or outside the European Union?

Yes  No

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| If yes, please list the name of the agencies and the countries where they are located: |
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1. Is your company a parent, subsidiary, affiliate, branch, or office of a foreign-owned company or business?

Yes  No

If yes, please provide business name and address of parent company (do not use abbreviations):

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1. Do you have any parent, subsidiary, affiliate, branch or offices outside of the European Economic Area or Switzerland?

Yes  No

If yes, list business name and countries where located (do not use abbreviations):

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1. Do you have full or partial ownership of any **additional** business involved in the export or import of products or services?

Yes  No

If yes, please list business name and countries where located (do not use abbreviations):

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**End of the Trade Compliance Questionnaire**

**Thank you for your cooperation in completing this questionnaire.**

**Trade Compliance Information Sheet**

This Trade Compliance Information Sheet is intended to make you are aware of important trade and export compliance regulations. The information is not comprehensive or exhaustive, and is provided primarily in relation to the export and sale of U.S. technologies and products under the U.S. Dept. of Commerce’s Export Administration Regulations. In addition to U.S. export regulations, the products/services may be subject to EU, EU member state or other state export regulations. To insure you understand the export regulations of any specific country, please consult with the appropriate national or local trade and export compliance agency. It is your and not Ingram Micro’s responsibility to ensure that your export and resale transactions do not violate the export control regulations enacted by U.S., the EU, or any specific country, and that you have obtained required export authorizations/licenses before you proceed with your export, import and resale transaction.

#### **Product Classification**

* The level of controls applied to a transaction is determined by the government-designated classification of the product/service in combination with the country of destination. Based on the product/service classification, certain technologies products may require prior export license approval as defined within the scope of the applicable regulations. These types of products/services include but are not limited to:
* Hardware, software and technology products with high levels of encryption functionality.
* Certain network infrastructure products such as high-end routers or switches designed for high volume communications.
* Products exported to foreign government end-users.
* Certain network infrastructure products exported to foreign telecommunications companies and Internet Service Providers (ISP’s).
* Products/services determined to be of dual use (civil and military use)

### Customer Compliance Screening – Know Your Customer

Products/services purchased from Ingram Micro must not be sold to any person, entity or business listed on any of the denial lists published by government authorities including the U.S., E.U. and local government. It is illegal for a U.S. company or its foreign subsidiaries to conduct export or transact business with a company or individual listed on the U.S. Government's Table of Denial Orders, Entity List, Specially Designated Nationals List or the Debarred List.

It is your responsibility to know and screen your customer to ensure that you do not deliver products or services to restricted, denied or sanctioned parties, and you shall not rely upon any assessment or decision made by Ingram Micro with respect to any customer restrictions.

## Destination Country Screening

You may not, without a valid license, export or re-export products or services to any embargoed countries, which currently are identified as Cuba, Iran, North Korea, Sudan, Syria and the Crimea Region of Ukraine. For information concerning export licenses you should contact the U.S. Embassy or Consulate or the competent E.U. or national authorities.

**Non-Proliferation of Weapons of Mass Destruction (WMD)**

Non-Proliferation Screening is based on detailed regulations covering product/service end-use and end-user activities. Non-Proliferation Screening has been enacted to insure that resale transactions do not involve:

* Prohibited nuclear end-uses and/or end-users without proper licensing authority issued by the U.S. Government, appropriate E.U. governing body, or local government.
* Prohibited missile end-uses and/or end-users without proper licensing authority issued by the U.S. Government, appropriate E.U. governing body, or local government.
* Prohibited chemical and biological weapon end-uses and/or end-users without proper licensing authority issued by the U.S. Government, appropriate E.U. governing body, or local government.

You may not, without a valid license, knowingly resell any product/service involved in proliferation activities. Although most of the products/services that Ingram Micro offers for resale can be legally resold and exported, it is illegal to make products or services available to anyone engaged in the proliferation of nuclear, chemical or biological weapons, or in missile technology development.

## High Risk for Diversion Screening Guidance

Diversion Risk screening is designed to avoid a violation of any part of the applicable governing trade and export regulations. You are prohibited from proceeding with a resale, export, re-export or other transfer of products/services if you have knowledge that a violation of the export control regulations may or is about to occur, or has actually occurred in connection with any disposition of the products/services. You may not resell, export, re-export or transfer any products/services if you have knowledge that your customer (or any other party) will export, re-export or otherwise transfer products/services without having obtained the proper license or authorization. It is illegal to knowingly make products/services available to any persons or companies who intend to divert such products/services to unauthorized or restricted destinations, end-users or end uses.

### U.S. Government Country Group D List

The Country Group D list identifies countries where the U.S. has national security or proliferation concerns based on activities including but not limited to nuclear proliferation, missile technology development, and chemical and biological weapons development. Based on these concerns, the U.S. Government restricts exports or re-exports that would make a material contribution to any of these activities in Group D Countries. Depending on the Export Control Classification Number (ECCN) assigned to the product/service, certain technology, computer and telecommunication products/services may require a formal export license approval from the Bureau of Industry and Security. The Country Group D list is available in Supplement No. 1 to Part 740 of the Export Administration Regulations. For further information contact the U.S. Embassy or Consulate.

The Country D list consists of the following countries:

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| Afghanistan | Cuba | Korea, North | Mongolia | Tajikistan |
| Armenia | Egypt | Kuwait | Oman | Turkmenistan |
| Azerbaijan | Georgia | Kyrgyzstan | Pakistan | Ukraine |
| Bahrain | Iran | Laos | Qatar | United Arab Emirates |
| Belarus | Iraq | Lebanon | Russia | Uzbekistan |
| Burma | Israel | Libya | Saudi Arabia | Vietnam |
| Cambodia | Jordan | Macau | Syria | Yemen |
| China (PRC) | Kazakhstan | Moldova | Taiwan |  |

**Manufacturer Restrictions**

Certain products/services offered for sale by Ingram Micro are subject to specific manufacturer restrictions with respect to which countries and to which customers the products/services can be sold by Ingram Micro. Although the products/services can generally be sold freely within the European Economic Area (EEA) and Switzerland, most products/services are subject to restrictions with respect to resale outside these countries. If you intend to resell any products/services acquired from Ingram Micro outside the EEA or Switzerland (irrespective of any government export regulations), please consult with your Ingram Micro account manager for any manufacturer directed resale restrictions. Violation of manufacturer restrictions may result in Ingram Micro being prevented from conducting further sales to you of the manufacturer’s products/services. It is your responsibility to know and meet any manufacturer directed restrictions.

**ACKNOWLEDGEMENT**

* We have answered the questions in this Trade Compliance Questionnaire with the correct information. We have also read the Trade Compliance Information Sheet included in this Questionnaire and we agree with the text and acknowledge the restrictions applicable to resale, export and import of the products/services acquired from Ingram Micro. We represent that we will not resell or otherwise disposition any products/services acquired from Ingram Micro to countries, companies or physical persons for any purposes that may be in breach of any export control regulation enacted by the United States of America, the European Union or any national authority.
* We agree to promptly notify Ingram Micro and in writing if we plan or intend to start export, import or re-export activities to countries outside the European Economic Area and Switzerland if these activities are not part of our current business and/or if we plan or intend to resell, export or re-export any products/services to countries, companies or physical persons for any purposes that may be in breach of any export control regulation enacted by the United States of America, the European Union or a national government.
* We agree to hold harmless and indemnify Ingram Micro against any loss, damage, penalties and other consequences arising from a claim raised against Ingram Micro due to our violation or breach of any export control or trade regulations enacted by the United States of America, the European Union or a national government authority.
* We also agree to promptly notify Ingram Micro in writing of any changes in the control or ownership of our company and business, and of any material or detrimental changes to our financial situation.

# Company Name

Company Officer Signature Print Name

Company Officer Title Date

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| **Please return the completed Trade Compliance Questionnaire to:** | Ingram Micro \_\_\_  Address:  Fax:  Email: |
| **If you have any questions related to Ingram Micro’s Trade Compliance program, please contact:** | Lyubomir Modev  Regional Compliance Officer, *Ingram Micro Europe*  Ingram Micro SSC EMEA  115 “Tsargradsko Shose”  1784 Sofia, Bulgaria  Direct: +359-2-804 9183  e-mail : [lyubomir.modev@ingrammicro.com](mailto:lyubomir.modev@ingrammicro.com) |
| **For more information about U.S and E.U. export control regulations, you can access any of the listed websites:** | * The US export control basics: <http://www.bis.doc.gov/index.php/exporter-portal> * An overview of all U.S. consulates: [www.usembassy.gov/](http://www.usembassy.gov/) * European Union: <http://ec.europa.eu/trade/import-and-export-rules/export-from-eu/>   [LOCAL reference]: |