



Trade Compliance Information Sheet

As an outreach to our customers who resell technology and computer products, this information sheet is intended to make you are aware of important trade compliance regulations. The information provided below is primarily related to the U.S. Dept. of Commerce, Export Administration Regulations. It is the responsibility of the Purchaser to ensure that its resale transactions do not violate the export control regulations enacted by U.S., or local government law.

Product Classification

The level of control applied to a transaction is determined by the government-designated classification of the product in combination with the country of destination. Based on the product classification, certain technology, computer and telecommunication products may require formal export license approval as defined within the scope of the applicable regulations. These types of products 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).

Customer Base Compliance Screening – Know Your Customer

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

Destination Country Screening

You may not, without a license, export or re-export Ingram Micro products to embargoed destinations and terrorists supporting countries identified as Cuba, Iran, North Korea, Sudan, Syria and Crimea Region of Ukraine. For further information contact the nearest U.S. Embassy or Consulate.

Non-Proliferation of Weapons of Mass Destruction (WMD)

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

- Prohibited nuclear end-uses and/or end-users without proper licensing authority issued by the U.S. Government, or local government.
- Prohibited missile end-uses and/or end-users without proper licensing authority issued by the U.S. Government, or local government.



A subsidiary of:



- Prohibited chemical and biological weapon end-uses and/or end-users without proper licensing authority issued by the U.S. Government, or local government.

You may not, without a license, knowingly resell any item to end-users involved in proliferation activities. Although most of the products that Ingram Micro offers for resale can be legally exported to most destinations, it is illegal to make products available to end-users 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 help the Purchaser avoid a violation of the applicable governing trade regulations. The Purchaser is prohibited from proceeding with an export transaction, re-export or transfer of the item, if the person or firm has knowledge that a violation of the export control regulations has occurred, is about to occur, or is intended to occur in connection with the item. A firm may not export, re-export or transfer an item if they have knowledge that the customer will re-export or transfer that item without the proper licensing authority. It is illegal to knowingly make products available to persons or front companies who intend to divert products to unauthorized 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 assigned to the product, certain technology, computer and telecommunication products 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.

