

## TRADE COMPLIANCE QUESTIONNAIRE

Will any of the products or services purchased from Ingram Micro be exported from or imported into a country outside your country incorporation\*?

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

\* If your country of incorporation is within the European Economic Area any transactions within this area will not be treated as an export

### 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. Do you intend to export the products you buy from Ingram Micro ? : (\*) Yes or No
  
2. Do you want to sell Ingram Micro products to government agencies? (\*) Yes or No
  - If Yes, Please list the name of agencies and the countries where they are located.
  - \_\_\_\_\_
  - \_\_\_\_\_
  
3. Is your company a parent, subsidiary, affiliate, branch, or office of a foreign-owned company or business? (\*) Yes or No
  - If yes, please list the name and address of the parent company (please, detail the full name, without the use of abbreviations)
  - \_\_\_\_\_
  - \_\_\_\_\_
  
4. Do you have any parent company, subsidiary, related company, branch or office outside the territory you are located? (\*) Yes or No
  - If yes, please list business name and countries where located.
  - \_\_\_\_\_
  - \_\_\_\_\_
  
5. Do you have full or partial ownership of any additional business involved in the export or import of products or services? (\*) Yes or No
  - If yes, please list business name and countries where located.
  - \_\_\_\_\_
  - \_\_\_\_\_

6. Has your company or any company linked to yours previously worked with Ingram Micro?: (\*) Yes No
7. Does someone from the management of your company keep other management positions in other companies related to the IT or Telecommunication sector?: (\*) Yes No?
8. Click on any of the following categories that best describe your business.

- |  |  |  |
|--|--|--|
| <input type="checkbox"/> Agricultura         | <input type="checkbox"/> Biotecnología         | <input type="checkbox"/> Telecomunicaciones  |
| <input type="checkbox"/> Ingeniería          | <input type="checkbox"/> Servicios Financieros | <input type="checkbox"/> Consultoría         |
| <input type="checkbox"/> Medios              | <input type="checkbox"/> Retail                | <input type="checkbox"/> Hospitality         |
| <input type="checkbox"/> Vestimenta ( moda ) | <input type="checkbox"/> Química               | <input type="checkbox"/> Transporte          |
| <input type="checkbox"/> Entretenimiento     | <input type="checkbox"/> Comida y Bebida       | <input type="checkbox"/> Educación           |
| <input type="checkbox"/> Sin fin de lucro    | <input type="checkbox"/> Logística             | <input type="checkbox"/> Aseguradoras        |
| <input type="checkbox"/> Banca               | <input type="checkbox"/> Comunicaciones        | <input type="checkbox"/> Servicios Publicos  |
| <input type="checkbox"/> Medioambiental      | <input type="checkbox"/> Gobierno              | <input type="checkbox"/> Electronica         |
| <input type="checkbox"/> Recreo              | <input type="checkbox"/> Tecnología            | <input type="checkbox"/> Maquinarias         |
|  | <input type="checkbox"/> Construcción          | <input type="checkbox"/> Energía Fabricación |
|  | <input type="checkbox"/> Salud y Cuidado       | <input type="checkbox"/> Otros               |

9. What kind of products does your company intend to sell?

- |   |   |   |
|---|---|---|
| <input type="checkbox"/> Audiovisual      | <input type="checkbox"/> OEM            | <input type="checkbox"/> Switches           |
| <input type="checkbox"/> Consumibles      | <input type="checkbox"/> Tablets        | <input type="checkbox"/> UPS                |
| <input type="checkbox"/> Sobremesas       | <input type="checkbox"/> DC POS         | <input type="checkbox"/> Domótica           |
| <input type="checkbox"/> GPS              | <input type="checkbox"/> Impresoras,    | <input type="checkbox"/> Seguridad Física   |
| <input type="checkbox"/> Mobile Computing | <input type="checkbox"/> Servidores     | <input type="checkbox"/> Iluminación        |
| <input type="checkbox"/> Monitores        | <input type="checkbox"/> Software       | <input type="checkbox"/> Material eléctrico |
| <input type="checkbox"/> Networking       | <input type="checkbox"/> Almacenamiento | <input type="checkbox"/> Otros              |

#### OPTIONAL/ADDITIONAL

- Does someone from the management of your company have been involved in bankruptcy proceedings or suspension of payments – Y/N
- 
- Does someone from the management of your company have full or partial ownership of any additional business related to the IT or the telecommunication
- Which of the following vendors ?

**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:**

Afghanistan	Democratic Republic of Congo	Kuwait	Oman	Turkmenistan
Armenia	Egypt	Kyrgyzstan	Pakistan	Ukraine
Azerbaijan	Eritrea	Laos	Qatar	United Arab Emirates
Bahrain	Georgia	Lebanon	Russia	Uzbekistan
Belarus	Haiti	Libya	Saudi Arabia	Venezuela
Cambodia	Iraq	Macau	Somalia	Vietnam
Central African Republic	Israel	Moldova	South Sudan	Yemen
China (PRC)	Jordan	Mongolia	Taiwan	Zimbabwe
Cyprus	Kazakhstan	Myanmar	Tajikistan	

**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. 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 And Export Control Statement

- We have answered the questions in this Trade Compliance Questionnaire with the correct information. We have also read the Trade Compliance Information Sheet, which is an integral part of 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 declare 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 in writing 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. We have also read the Trade Compliance Information Sheet 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 acknowledge that products purchased from Ingram Micro may be subject to applicable export and import laws including those of the US, EU and national laws (which in some instances prohibit or restrict in-country sales to certain end-users), and that diversion contrary to such US, EU or national laws or regulations is prohibited. We accept that it is our responsibility to determine all applicable laws or regulations that apply to us and the products we export and trade in, and to comply with them, for example, by securing all necessary permits, authorizations and licenses for export and import and making all proper filings. In particular, we accept and commit ourselves not to sell or make available products purchased from Ingram Micro to restricted or sanctioned countries (including but not limited to Iran, Cuba, Syria, Sudan, North Korea and the Crimea Region of Ukraine), companies or persons in breach of any export and trade control or dual use regulations enacted by the US, the EU or the countries we operate from.

- We certify that none of the products, services or technical data supplied by Ingram Micro will be used by us or knowingly sold or otherwise transferred to, or made available for use by or for, any entity that is engaged in the design, development, production or use of nuclear, biological or chemical weapons or missiles.

- We were made aware that the products purchased from Ingram Micro may be specific for the [local?](#) market and not intended to be exported without the explicit approval of the manufacturers, and acknowledge that the products may not enjoy the benefit of warranties, indemnities and technical approvals /if they are sold for use outside Europe/. We agree to take full responsibility for any defects and conformity issues and will seek the approval of the respective manufacturers if we would sell the products outside Europe.



- We agree to maintain an effective export compliance program to ensure compliance with our export and re-export activities, and agree to maintain a record of sales, imports, exports and re-exports of products and technology in accordance with the national record retention programs in the appropriate geographies, but at least for five (5) years.
- We agree to notify Ingram Micro immediately and in writing, including a statement on the products in scope for each particular transaction, if we intend to deliver any products or start export activities to countries outside the EU and/or if we intend to sell to countries, companies, or persons that may be subject to export and trade control regulation enacted by the US, the EU or a national government, and agree to indemnify Ingram Micro in case of a claim raised against Ingram Micro by any third party arising from our breach of applicable export and trade control regulations enacted by the US, the EU or a national government.
- We agree to immediately notify Ingram Micro of any changes in the ownership of our business or any other relevant change in the management/finance area of our business as set forth, herein by certified mail to Ingram Micro.
- By signing this statement, I am confirming that I have the authority to legally represent the company and to sign on behalf of the company.

\_\_\_\_\_  
Company Name and Stamp

\_\_\_\_\_  
Company Officer Signature

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Company Officer Title

\_\_\_\_\_  
Date

<p><b>Please return the completed Trade Compliance Questionnaire to:</b></p>	<p>Ingram Micro Address:  Fax: Email:</p>
<p><b>If you have any questions related to Ingram Micro’s Trade Compliance program, please contact:</b></p>	<p>....., <i>Ingram Micro Europe</i> ..... Ingram Micro SSC EMEA 115 “Tsargradsko Shose” 1784 Sofia, Bulgaria Email: Direct: +359-2-804 9183 e-mail : NCA Trade Compliance newaccounts.tradecompliance@ingrammicro.com</p>
<p><b>For more information about U.S and E.U. export control regulations, you can access any of the listed websites:</b></p>	<ul style="list-style-type: none"> <li>• The US export control basics: <a href="http://www.bis.doc.gov/index.php/exporter-portal">http://www.bis.doc.gov/index.php/exporter-portal</a></li> <li>• An overview of all U.S. consulates: <a href="http://www.usembassy.gov/">www.usembassy.gov/</a></li> <li>• European Union: <a href="http://ec.europa.eu/trade/import-and-export-rules/export-from-eu/">http://ec.europa.eu/trade/import-and-export-rules/export-from-eu/</a></li> </ul> <p>[LOCAL reference]:</p>