

U.S. Export Controls – Intermediate Workshop

Export Control Symposium
September 22, 2015

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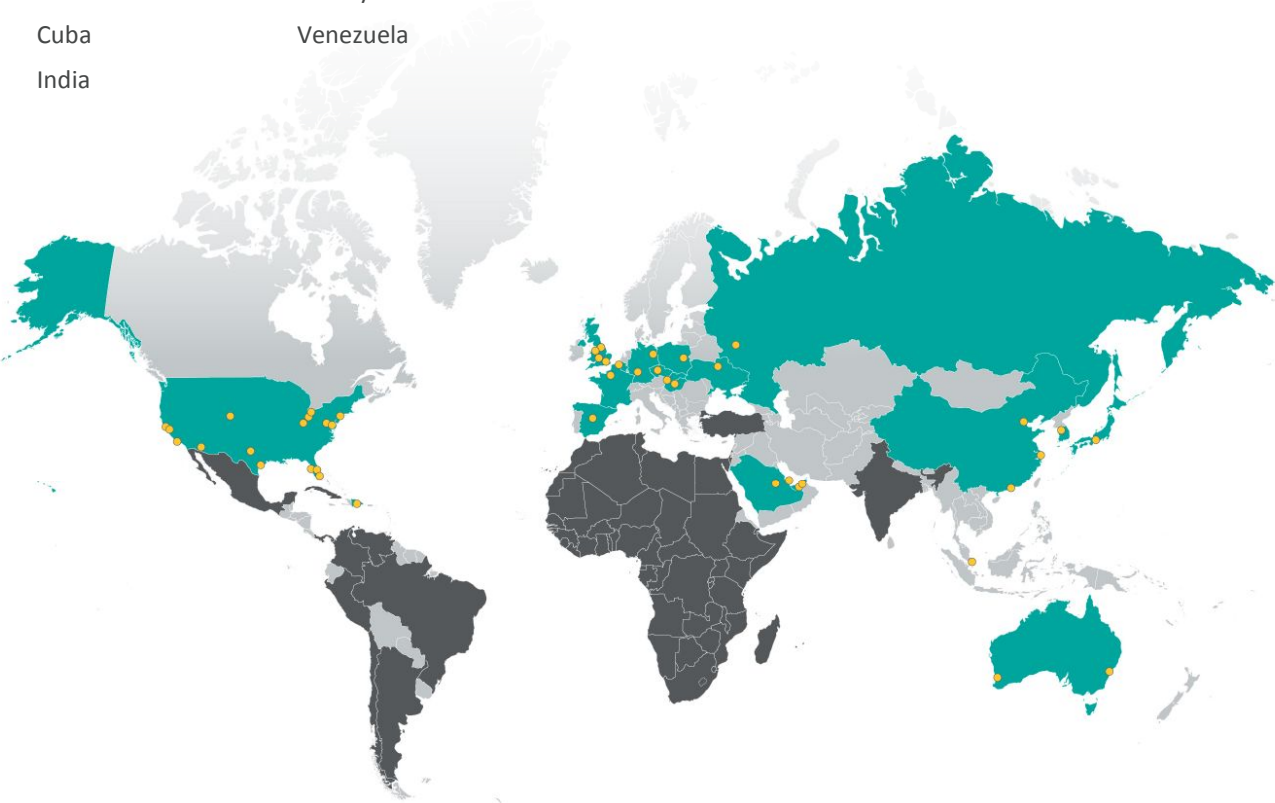


Worldwide Locations

- Abu Dhabi
- Beijing
- Berlin
- Birmingham
- Bratislava
- Brussels
- Budapest
- Cincinnati
- Cleveland
- Columbus
- Dallas
- Denver
- Doha
- Dubai
- Frankfurt
- Hong Kong
- Houston
- Kyiv
- Leeds
- London
- Los Angeles
- Madrid
- Manchester
- Miami
- Moscow
- New York
- Northern Virginia
- Palo Alto
- Paris
- Perth
- Phoenix
- Prague
- Riyadh
- San Francisco
- Santo Domingo
- Seoul
- Shanghai
- Singapore
- Sydney
- Tampa
- Tokyo
- Warsaw
- Washington DC
- West Palm Beach

- Africa
- Argentina
- Brazil
- Chile
- Colombia
- Cuba
- India
- Israel
- Mexico
- Panamá
- Peru
- Turkey
- Venezuela

■ Office locations
■ Regional desks and strategic alliances



Agenda

U.S. Export Controls Overview and Comparison of ITAR, EAR and UK Export Controls

- Overview of U.S. Export Controls and the current state of ECR
- Is the item under the EAR or the ITAR and what is the impact?
 - Developing a framework for order of review from USML to 600 series to general CCL
 - Differentiating between ITAR and EAR jurisdictional tests: “specifically” designed vs. “specially” designed and when each is used
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Laws, Regulations and Government Agencies

	Defense Articles & Services	Other Items	Dealings – Sanctioned Countries / Persons
Government Agency	US Department of State, Directorate of Defense Trade Controls (DDTC)	US Department of Commerce, Bureau of Industry and Security (BIS)	US Department of the Treasury, Office of Foreign Assets Control (OFAC)
Legal Authority	Arms Export Control Act (AECA)	International Emergency Economic Powers Act (IEEPA), Export Administration Act (EAA) - lapsed	International Emergency Economic Powers Act (IEEPA), Trading with the Enemy Act (TWEA)
Implementing Regulations	International Traffic in Arms Regulations (ITAR)	Export Administration Regulations (EAR)	Sanctions Regulations 31 C.F.R. 501-599 North Korea, Cuba, Syria, Sudan, Iran, Crimea SDN-driven programs (e.g., Russian Entities)
Control List	US Munitions List (USML)	Commerce Control List (CCL)	--
Website	pmdrtc.state.gov	bis.doc.gov	treas.gov/offices/enforcement/ofac

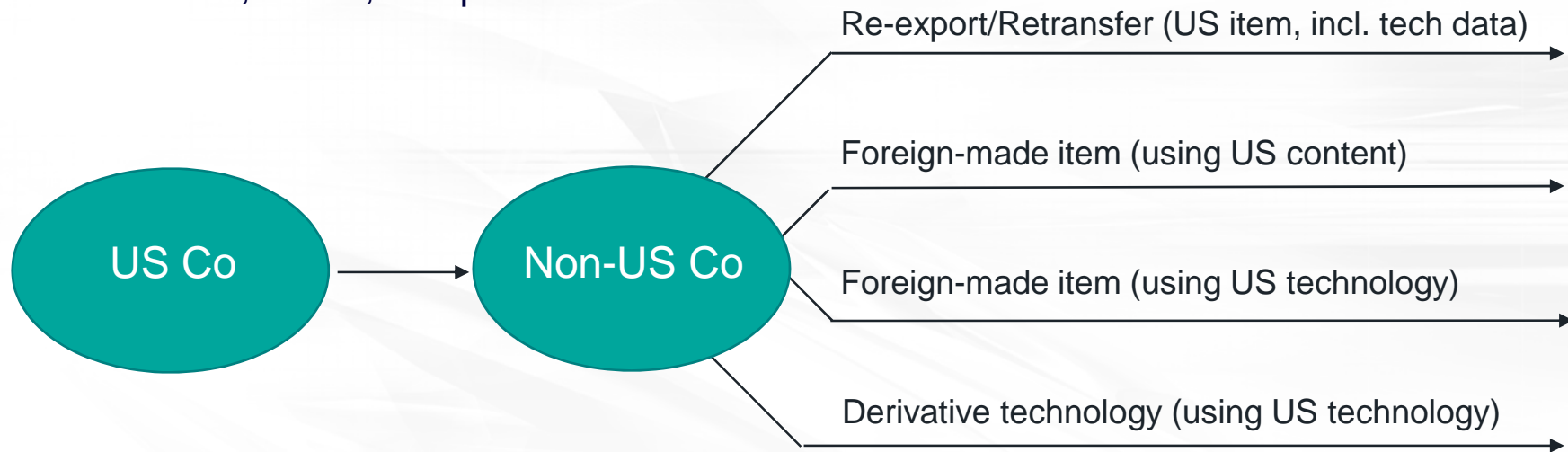
Scope of US Export Controls

The application of US export controls depends on:

- WHERE: Place of export?
 - Every person in United States, including a UK national or UK company, is subject to US export controls
 - Every item in the United States, including UK made item, is subject to US export controls
- WHO: Nationality of the exporter?
 - A US national or a US company is subject to US export controls, even when all export activities occur outside United States
 - May also be subject to the local country's export controls
- WHAT: Origin of the goods and/or technology being exported?
 - US-origin items remain subject to US controls even after they leave the United States and even after incorporation into a UK product
 - May also be subject to the local country's export controls

Scope of US Export Controls

- ITAR governs:
 - All exports from the United States
 - Reexports and retransfers of US-content
- EAR governs:
 - All exports from the United States
 - Most, not all, reexports and retransfers



Comparison to UK Export Controls

US System

- Nationality-based and geographical location based
- Split regulatory authority
- Post-delivery re-export controls
- “Deemed exports”
- Audits only if there are problems
- No open licensing, but makes copious use of “exemptions” (ITAR) and “exceptions” (EAR)

UK System

- Geographical location based, regardless of nationality
- Single regulatory authority
- Risk of diversion assessed up front
- No “deemed exports”
- Regular audits by the ECO
- Extensive use of open licensing

Current State of ECR List Reform: Military Items Moved to the EAR

- Not Transitioned, Totally ITAR
 - Category I – Firearms, Close Assault Weapons and Combat Shotguns
 - Category II Guns and Armament
 - Category III – Ammunition/Ordnance
 - Category XII – Fire Control, Range Finder, Optical and Guidance and Control Equipment (transition published in draft)
 - Category XIV – Toxicological Agents, Including Chemical Agents, Biological Agents, and Associated Equipment
 - Category XVII – Classified Articles, Technical Data, and Defense Services Not Otherwise Enumerated
 - Category XVIII – Directed Energy Weapons
 - Category XXI – Articles, Technical Data, and Defense Services Not Otherwise Enumerated
- Transitioned, Moved to EAR
 - Certain items and “specially designed” parts and components of the following:
 - Categories IV, V, VI, VII, VIII, IX, X, XI, XIII, XV, XIX and XX

Certain items from Cat. XVI, Nuclear Weapons Related Articles, transitioned to Department of Energy or the Nuclear Regulatory Commission

Current State of ECR List Reform: Military Items Moved to the EAR

Cat	ECCN(s)	ECCN Heading
IV	0A604 / 3A611 / 9A604	Commodities Related to Military Explosive Devices and Charges / Military electronics / Commodities related to launch vehicles, missiles, and rockets
V	1C111 / 1C608	Propellants and constituent chemicals for propellants / Energetic materials and related commodities
VI	8A609	Surface vessels of war
VII	0A606	Ground vehicles
VIII	9A610 / 9A619 / 3A611	Military aircraft / Military gas turbine engines / Military electronics
IX	0A614	Military Training Equipment
X	1A613 / 9A515	Armored and protective equipment / Spacecraft and related commodities
XI	3A611 / 9A620	Military electronics / Cryogenic and superconductive equipment

Current State of ECR List Reform: Military Items Moved to the EAR

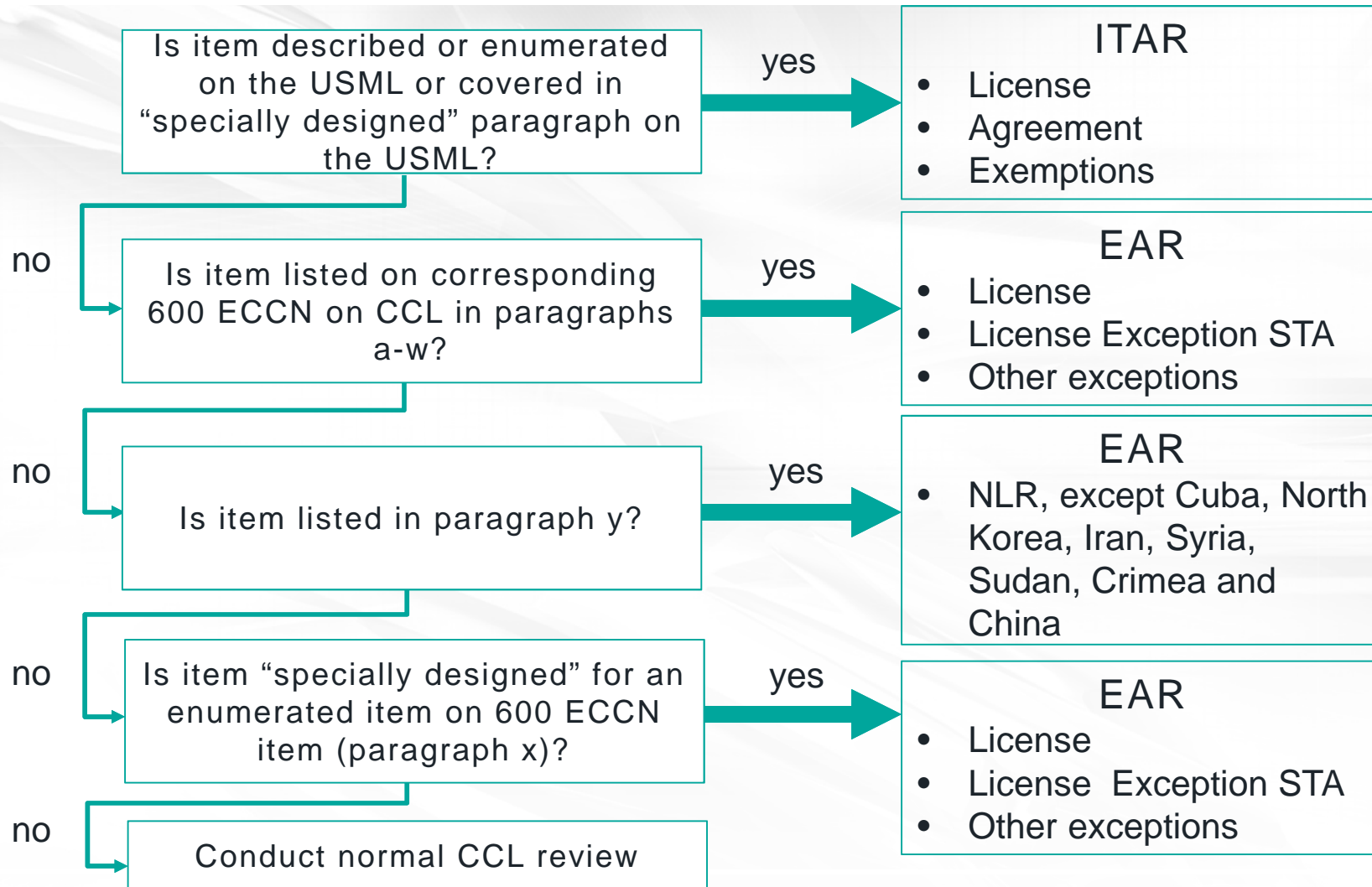
Cat	ECCN(s)	ECCN Heading
XIII	0A617 / 8A620.f / 0A606 / 1A613	Miscellaneous equipment and materials/ Submersible vessels, oceanographic and associated commodities / Ground vehicles / Armored and protective equipment
XV	9A515 / 9A004 / 3Axxx / 6Axxx / 7A004 / 7A104	Spacecraft and related commodities / International Space Station / Space-qualified items / Star trackers / Gyro-astro compasses and other devices
XVI	N/A	No articles from Category XVI--Nuclear Weapons Related Articles are identified in "600 series" ECCNs. Exports of such items or services are under the export control of the Department of Energy or the Nuclear Regulatory Commission
XIX	9A619	New USML Category Military gas turbine engines
XX	8A620	Submersible vessels, oceanographic and associated commodities

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Post-Transition: Order of Review



Order of Review: Case Study

- Apply order of review to a GYRO
- Could be used in either of these applications



Inertial Navigation System
for F-22
Cat. VIII.e



Purely Civilian Application
Under EAR

Order of Review: Gyro Case Study

- Is item described or enumerated on the USML or covered in “specially designed” paragraph on the USML?
 - Not listed in Category VIII.
 - Assume we conclude gyro is not specially designed for an F-22 application
 - What is the next step?
 - Check the remainder of the USML before you go to the CCL
 - Cat. XII.d. controls “military accelerometers and gyros.”
 - But also states: “[f]or aircraft inertial reference systems and related components refer to Category VIII.”
- Is the gyro listed on corresponding 600 ECCN on CCL in paragraphs a-w?
 - 9A610.a-w - No
- Is the gyro listed in paragraph y?
 - 9A610.y - No
- Is the gyro “specially designed” for an enumerated item on 600 ECCN item (paragraph x)?
 - 9A610.x - Assume, No
- Is the gyro listed elsewhere on the CCL
 - See, 7A002, 7A102, EAR99, in this order.

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Determining Whether ITAR or EAR Applies

Two tests for determining export jurisdiction of items used in military applications

1. Test for USML categories not yet transitioned under ECR

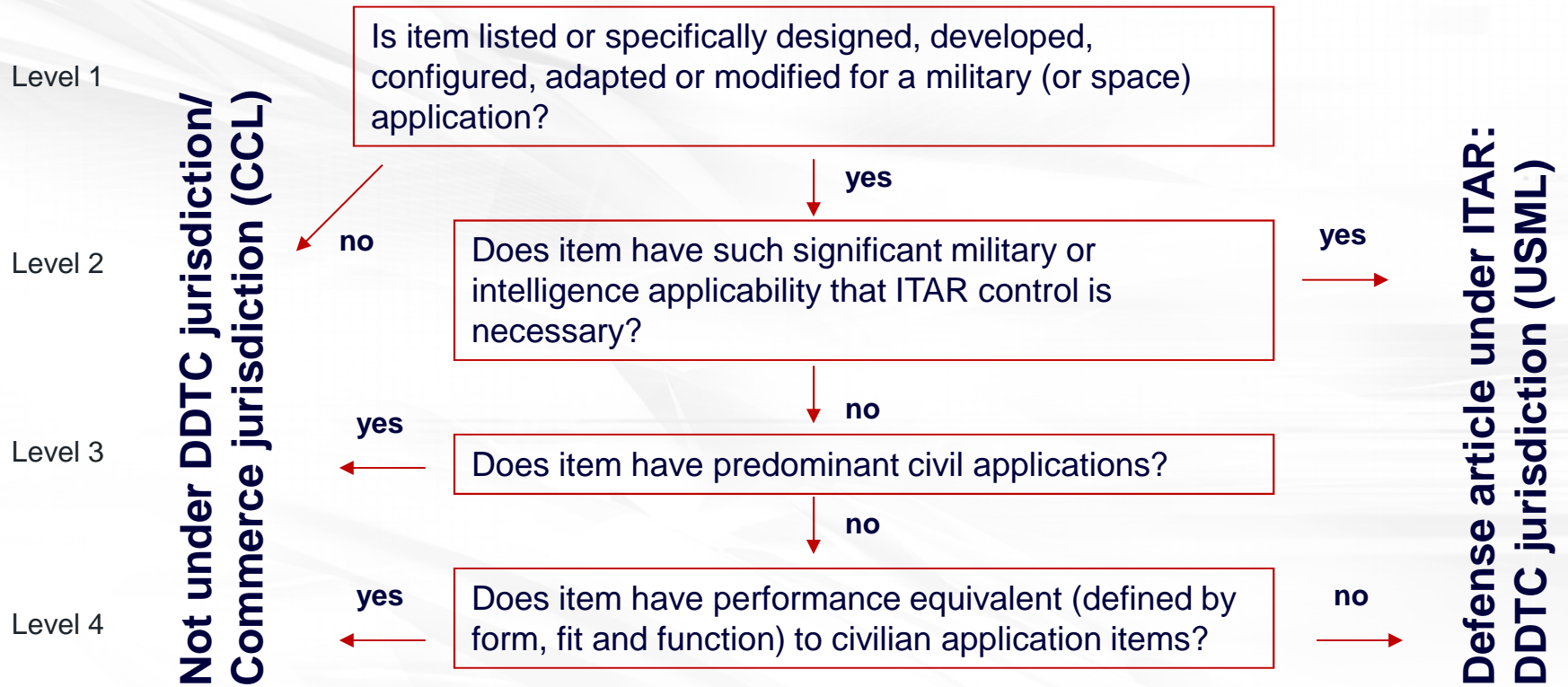
- Legacy test: “Specifically designed, modified or adapted test”
- Every item that is specifically designed, modified or adapted for a military (or space) application is subject to the ITAR, unless determined by DDTTC to be moved to the EAR, for example by a Commodity Jurisdiction process

2. Test for USML Categories transitioned under ECR

- Transition and future test: “specially designed test”
- USML becomes an enumerated list of items that require enhanced control because of their substantial or significant military or intelligence advantage, functionality or capability
- In addition, the USML lists “parts, components, accessories, attachments, and equipment ***specially designed*** for” the enumerated items

“The Department understands that in the process of revising the USML, applications of both concepts will not be ideal.”
78 FR at 22745.

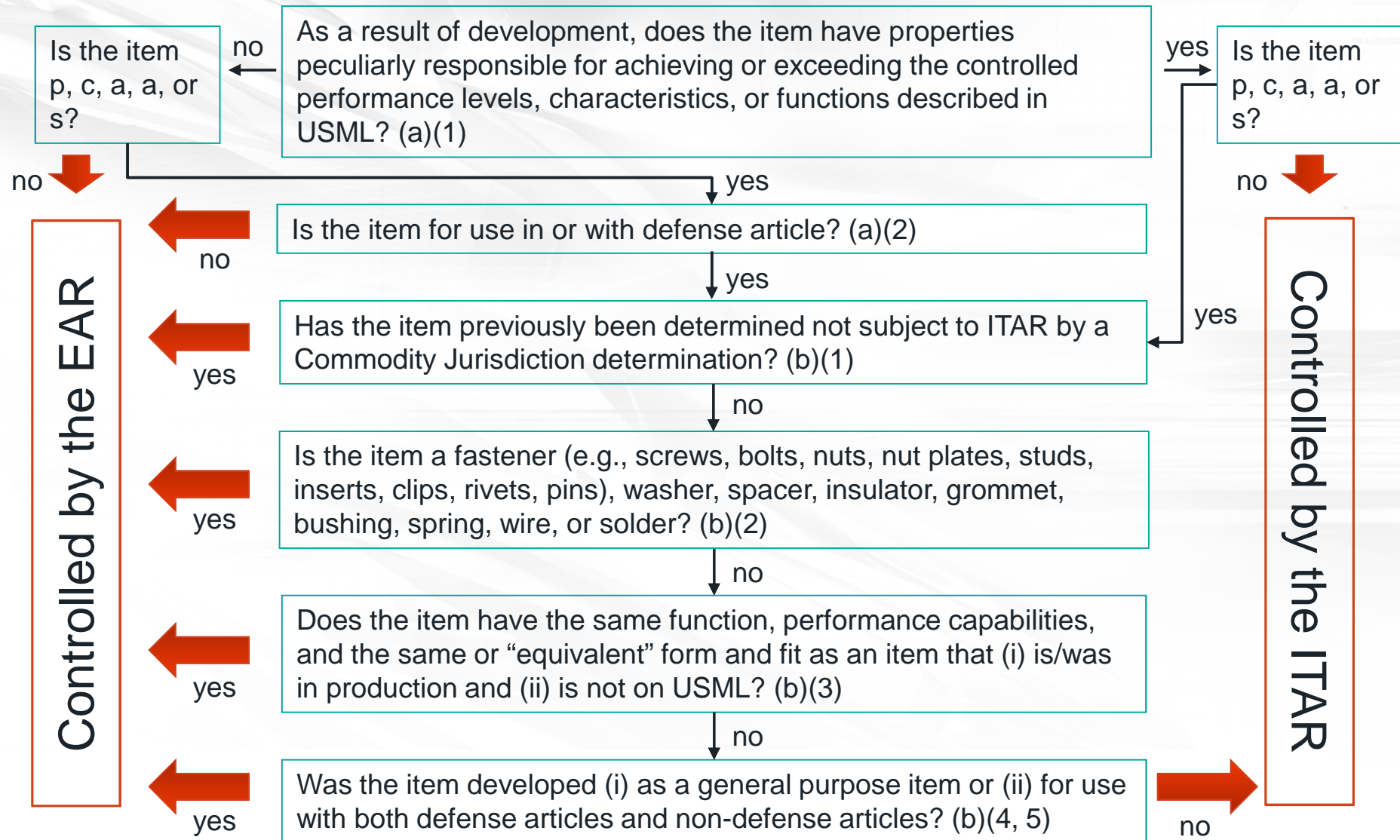
Specifically Designed Test: Decision Diagram for State (ITAR) vs. Commerce (EAR) Jurisdiction



- The intended use of the article after its export (i.e., for a military or civilian purpose) is not determinative

Specially Designed Test: Decision Diagram for State (ITAR) vs. Commerce (EAR) Jurisdiction

§ 120.41



Definitions of Part, Component, Accessory, Attachment, or Software

- Part -- § 120.45(d)
 - Any single unassembled element of a major or a minor component, accessory, or attachment which is not normally subject to disassembly without the destruction or the impairment of designed use. (Examples: rivets, wire, bolts, etc.)
- Component -- § 120.45(b)
 - An item that is useful only when used in conjunction with an end-item. A major component includes any assembled element that forms a portion of an end-item without which the end-item is inoperable. (Examples: airframes, tail sections, transmissions, tank treads, hulls, etc.) A minor component includes any assembled element of a major component.
- Accessories and attachments -- § 120.45(c)
 - Associated articles for any component, equipment, system or end-item, and which are not necessary for its operation, but which enhance its usefulness or effectiveness. (Examples: military riflescopes, special paints, etc.)
- Software -- § 120.45(f)
 - Includes but is not limited to the system functional design, logic flow, algorithms, application programs, operating systems and support software for design, implementation, test, operation, diagnosis and repair.

(b)(3) - Same Function, Performance Capabilities, and the Same or “Equivalent” Form and Fit

- The comparison item must be in “production” not in “development”
- “Equivalent” form means that the item being classified has been modified solely for fit purposes.
 - Form = its configuration (including the geometrically measured configuration), material, and material properties that uniquely characterize it
 - Fit = its ability to physically interface or connect with or become an integral part of another commodity
 - Function = the action or actions it is designed to perform.
 - Performance = the measure of a commodity's effectiveness to perform a designated function in a given environment (e.g., measured in terms of speed, durability, reliability, pressure, accuracy, efficiency)

(b)(4, 5) - Developed as Dual-purpose or as General Purpose Item

- Must establish that:
 - (4) Was or is being developed with knowledge that it is or would be for use in or with both defense articles on the USML and also commodities not on the USML;
 - (5) Was or is being developed as a general purpose commodity or software, i.e., with no knowledge for use in or with a particular commodity (e.g., a F/A-18 or HMMWV) or type of commodity (e.g., an aircraft or machine tool)
- This must be established by documents contemporaneous with the development.
 - For example, concept design information, marketing plans, declarations in patent applications, or contracts
 - Absent such documents, the commodity may not be excluded from being specially designed by either paragraph (b)(4) or (5)
- “Knowledge” includes not only the positive knowledge a circumstance exists or is substantially certain to occur, but also an awareness of a high probability of its existence or future occurrence
 - Such awareness is inferred from evidence of the conscious disregard of facts known to a person and is also inferred from a person's willful avoidance of facts

Specially Designed Test: Product Migration / Export Jurisdiction

Product / Modification

- Specially designed component determined not subject to ITAR by prior CJ determination
- Fastener specially designed to meet MILSPEC and ruggedness
- Major component being developed to meet MILSPEC but also intended for civil market
- Part used in civ & mil production; military part differs only in mounting/physical dimensions
- Poor civil market sales, downgrade civ version capabilities and cost. Impact on military version?

Export Jurisdiction

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Comparison of Controls: ITAR vs. EAR

	ITAR	EAR	UK
Registration of Manufacturers, Exporters and Brokers	<ul style="list-style-type: none"> • Yes • Annual fee to register based on number of licenses obtained in prior year 	<ul style="list-style-type: none"> • No • EAR does not have any registration or license fees • EAR does not contain brokering regulations 	<ul style="list-style-type: none"> • No • BIS does not have any registration or license fees • Brokers are not required to register (YET)
Licenses	<ul style="list-style-type: none"> • Several different forms • End-use and end-user refers to ultimate government customer • PO or LOI required 	<ul style="list-style-type: none"> • Single form • End-use and end-user refers to customer and information obtained in normal course (but, 600 series is like ITAR) • No PO or LOI requirement 	<ul style="list-style-type: none"> • Several different forms • End use and end user refers to customer • PO may be accepted in lieu of end user undertaking
Exemptions/ Exceptions	<ul style="list-style-type: none"> • Narrow and used in special cases; often until TAA approved 	<ul style="list-style-type: none"> • Many useful exceptions used routinely 	<ul style="list-style-type: none"> • Many OGEL's used routinely, Art, 22(10)

Comparison of Controls: ITAR vs. EAR

	ITAR	EAR	UK
Agreements	<ul style="list-style-type: none"> TAAAs, MLAs, WDAs 	<ul style="list-style-type: none"> None. All exports and reexports on a single form (including technology) 	<ul style="list-style-type: none"> None
DN/TCN Employee	<ul style="list-style-type: none"> Based on current citizenship / nationality AND place of birth DN/TCN addressed by ITAR 124.16 and 126.18 	<ul style="list-style-type: none"> Based only on most recent citizenship/ nationality or permanent residence May use ITAR 124.16 and 126.18 	<ul style="list-style-type: none"> None
License Requirement	<ul style="list-style-type: none"> A license is always required 	<ul style="list-style-type: none"> License requirement depends on destination (“x” in the box) 	<ul style="list-style-type: none"> A license is required,
Proscribed Destinations	<ul style="list-style-type: none"> Numerous 126.1 countries, including China 	<ul style="list-style-type: none"> Only Cuba, Iran, Syria, Sudan, N. Korea, Crimea (and China and Venezuela for 600 series) 	<ul style="list-style-type: none"> No policy of denial, but case by case

Comparison of Controls: ITAR vs. EAR

	ITAR	EAR	UK
Retransfers	<ul style="list-style-type: none"> Require prior approval 	<ul style="list-style-type: none"> Generally no approval, but must follow license and exception conditions 	<ul style="list-style-type: none"> Generally no license
Reexports	<ul style="list-style-type: none"> Require prior approval 	<ul style="list-style-type: none"> Reexport requirement follows export requirement De minimis rule 	<ul style="list-style-type: none"> Reexport requirement follows export requirement Incorporation rule
Contamination Problem	<ul style="list-style-type: none"> Always 	<ul style="list-style-type: none"> If US content is de minimis, EAR ceases to apply If neither direct product nor US technology are NS, EAR ceases to apply 	<ul style="list-style-type: none"> None
Enforcement	<ul style="list-style-type: none"> Less likely to impose a fine if company demonstrates it acted responsibly 	<ul style="list-style-type: none"> More likely to impose a fine even if mistake is inadvertent and company acted responsibly 	<ul style="list-style-type: none"> Fines and penalties minimal, loss of license more likely

If Now Under EAR, Are We Done With the ITAR?

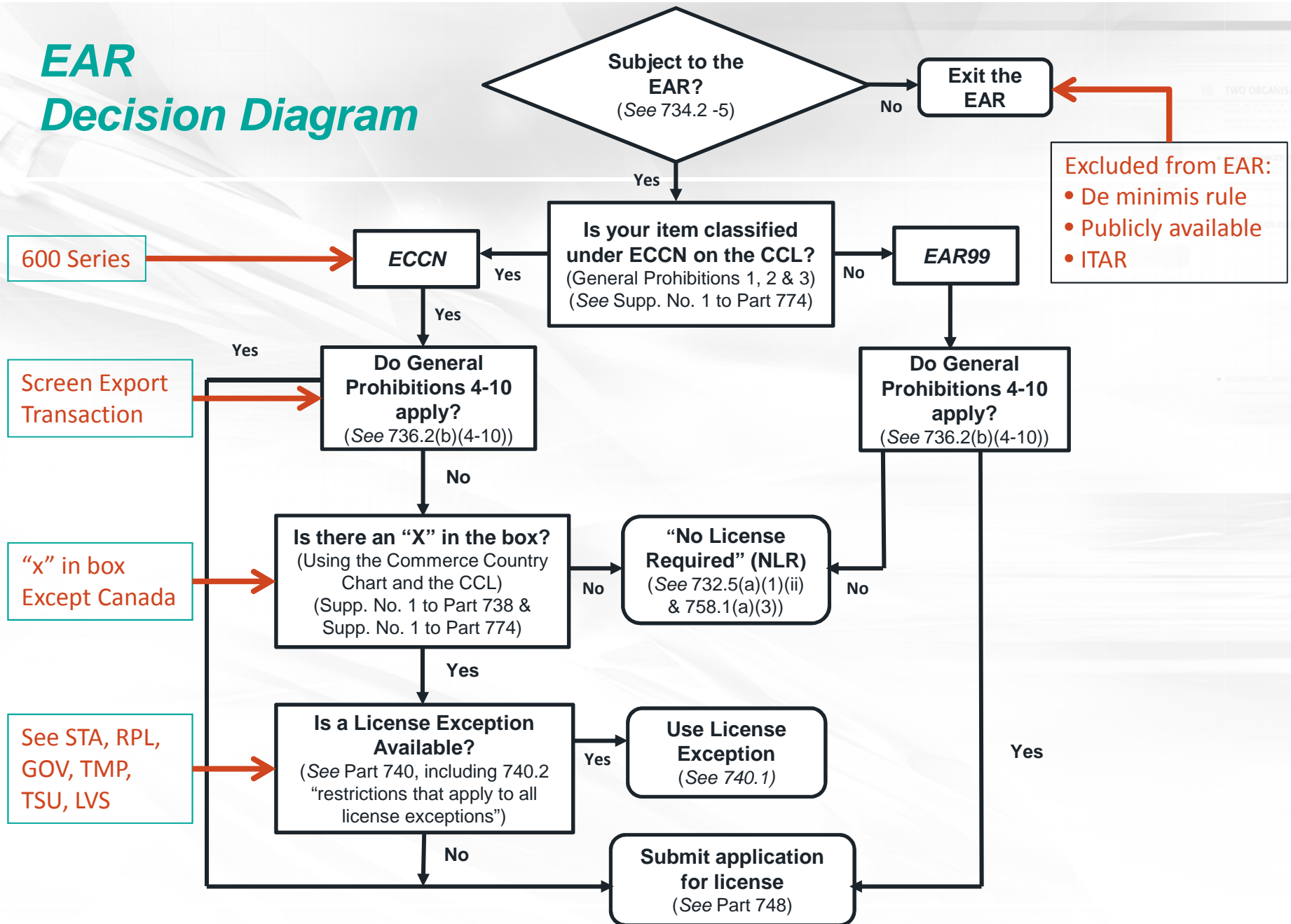
- No.
- You may not need:
 - DSP-5 export license for export of goods from the US
 - Eligible for STA or BIS license
 - MLA to manufacture goods developed in the US
- However, you may need:
 - TAA – technical assistance, end-product data and technical discussions
 - Brokering registration and license if you are a broker engaged in brokering activities

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EAR Decision Diagram



De Minimis Rule

Delivered value of US-origin content
controlled to ultimate destination

Ex-works value of non-US made
product incorporating US content

≤

0% - 600 series to D:5
10% - to sanctioned/AT
25% - to all others

- General Rule:
 - If the foreign-made item is destined for Iran, Syria, Sudan or North Korea, the US controlled content is de minimis if it is valued at 10% or less of the total value of the foreign-made item
 - If the foreign-made item is destined for any other country, the US controlled content is de minimis if it is valued at 25% or less of the total value of the foreign-made item
 - Compare hardware to hardware, software to software and technology to technology; do not sum US hardware, software and technology content
- 600 Series Rule:
 - There is no de minimis level for items enumerated or otherwise described in paragraphs .a through .x of a 9x515 or “600 series” ECCN when destined for a country listed in D:5 countries

Transaction Screening

- General Prohibition Four (Denial Orders)--Engaging in actions prohibited by a denial order
 - Screen denied parties list
- General Prohibition Five--Export or reexport to prohibited end-uses or end-users (Part 744)
 - Screen entity list
 - Screen OFAC SDN list
 - Screen for proliferation end-uses (nuclear, delivery system, CBW)
 - Screen for certain military end-uses (PRC, Venezuela)
- General Prohibition Six--Export or reexport to embargoed destinations (Part 746)
 - Screen for embargoed destinations: Cuba, Iran, Syria, Sudan, North Korea, Crimea, Russia oil/gas sector
- General Prohibition Seven--US Persons may not Support of Proliferation Activities
- General Prohibition Eight--In transit shipments and items to be unladen from vessels or aircraft
 - Armenia, Azerbaijan, Belarus, Cambodia, Cuba, Georgia, Kazakhstan, Kyrgyzstan, Laos, Mongolia, North Korea, Russia, Tajikistan, Turkmenistan, Ukraine, Uzbekistan, Vietnam
- General Prohibition Nine--Violation of any order, terms, and conditions
 - Syria
- General Prohibition Ten--Proceeding with transactions with knowledge that a violation has occurred or is about to occur
 - Screen for diversion risk red flags



What does “x” in the box mean?

- A license is required if “x” in box
- If no “x” or EAR99 use **NLR** for exports or reexports (pass screening)

Countries	Chemical & Biological Weapons			Nuclear Nonproliferation		National Security		Missile Tech	Regional Stability		Firearms Convention	Crime Control			Anti-Terrorism	
	CB 1	CB 2	CB 3	NP 1	NP 2	NS 1	NS 2	MT 1	RS 1	RS 2	FC 1	CC 1	CC 2	CC 3	AT 1	AT 2
Togo	X	X		X		X	X	X	X	X		X		X		
Tonga	X	X		X		X	X	X	X	X		X		X		
Trinidad & Tobago	X	X		X		X	X	X	X	X	X	X		X		
Tunisia	X	X		X		X	X	X	X	X		X		X		
Turkey ³	X					X		X	X							
Turkmenistan	X	X	X	X		X	X	X	X	X		X	X			
Tuvalu	X	X		X		X	X	X	X	X		X		X		
Uganda	X	X		X		X	X	X	X	X		X		X		
Ukraine ⁶	X					X	X	X	X	X		X	X			
United Arab Emirates	X	X	X	X		X	X	X	X	X		X		X		
United Kingdom ³	X					X		X	X							

License Exception STA

See EAR Part 740 for License Exceptions and Supp. 1 for Country Groups

- Authorizes exports and reexports to the following 36 countries:
 - Argentina, Australia, Austria, Belgium, Bulgaria, Canada, Croatia, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Japan, Latvia, Lithuania, Luxembourg, Netherlands, New Zealand, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, South Korea, Spain, Sweden, Switzerland, Turkey, or the United Kingdom.
- Comments
 - The *ultimate* end user must be armed forces, police, paramilitary, law enforcement, customs, correctional, fire, or a search and rescue agency of a government of one of the countries listed in Country Group A:5, or the United States Government
 - The purchaser, intermediate consignee, ultimate consignee, and end user must have been previously approved on a license or other approval issued by BIS or DDTC (not necessarily for same product or program)
 - Consignee undertaking required for export ***and for reexport and retransfer***

License Exception RPL

See EAR Part 740 for License Exceptions and Supp. 1 for Country Groups

- Authorizes
 - Exports and reexports associated with one-for-one replacement of parts previously lawfully exported from the US
 - Export and reexport of items that were returned to the United States for servicing and the replacement of defective or unacceptable US-origin commodities and software
- Comments
 - Items to be replaced are to be destroyed abroad or returned for replacement
 - Cannot be used for holding in stock

License Exception TMP

See EAR Part 740 for License Exceptions and Supp. 1 for Country Groups

- Authorizes temporary exports and reexports
 - Tools of the trade, except to Country Group E:2 + Sudan and Syria
 - Kits consisting of replacement parts, except to Country Group E:2
 - Items for exhibition or demonstration, except to Country Group E:2
 - Inspection, calibration, testing, repair, except to Country Group E:2
 - Exports to US sub, affiliate or facility in Country Group B (subject to further BIS authorization for retransfer or reexport)
 - Certain other exports and reexports
- Comments
 - Allows demonstration at trade show
 - 600 series not allowed to D:5 countries

License Exceptions TSU

See EAR Part 740 for License Exceptions and Supp. 1 for Country Groups

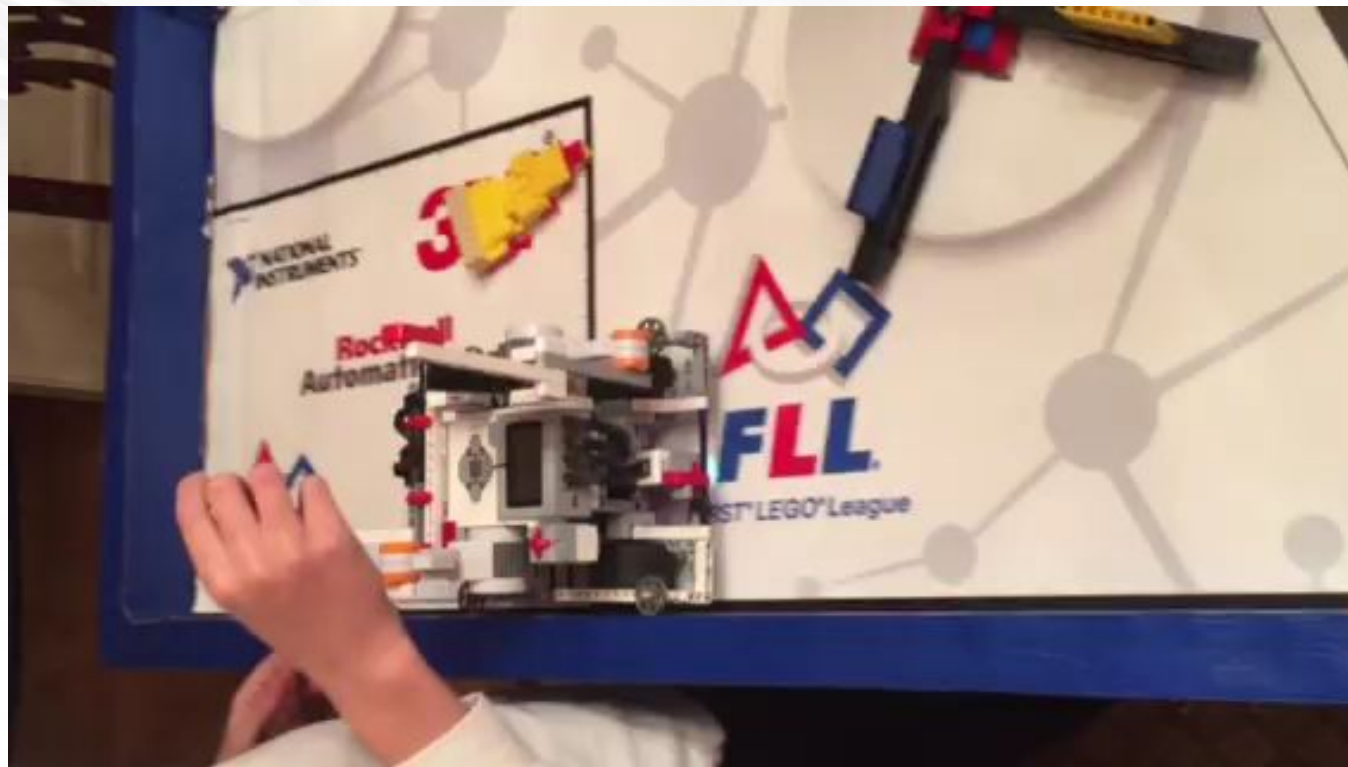
- Authorizes the export operation technology and sales technology
 - "Operation technology" is the minimum technology necessary for the installation, operation, maintenance (checking), and repair of those commodities or software that are lawfully exported or reexported under a license, a License Exception, or NLR.
 - "Sales technology" is data supporting a prospective or actual quotation, bid, or offer to sell, lease, or otherwise supply any item.
- Comments
 - Technology to support a sale can be exported and reexported anywhere (except sanctioned countries) without notice or license

Other License Exceptions

See EAR Part 740 for License Exceptions and Supp. 1 for Country Groups

- License Exception GOV
 - Authorizes exports and reexports of the following to personnel and agencies of the US Government or agencies of cooperating governments
 - Items for use by personnel and agencies of the US Government
 - Items for use within national territory by agencies of cooperating governments
 - Items for use by diplomatic and consular missions of a cooperating government
 - Other international bodies
 - Comment:
 - This is for direct export to the MOD or other cooperating governments not for delivery through industry contractor
- License Exception LVS
 - Authorizes the export and reexport of items of limited value as specified in the ECCN to Country Group B (Supp. 1 to Part 740)

Our Gyro in Action!



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