

Export Compliance

It is the policy of Toradex to fully comply with these international laws and regulations.

Export Control Classification Number (ECCN)



Different countries and trade zones have established limitations on exporting certain goods, technology or services. A very common classification of such items is “dual-use” – items, as they have both commercial and military or proliferation applications. Note that also purely commercial items without an obvious military use may also be subject to these export restrictions.

Dual use goods are products and technologies normally used for civilian purposes but which may have military applications. Most countries therefore restrict the export of certain commodities and technologies, and require an export license from the government prior to an export.

There are several international arrangements among countries, which seek to harmonize lists of dual-use (and military) technologies to control. These include the Nuclear Suppliers Group, the Australia Group (chemical and biological technologies), the Missile Technology Control Regime (focusing on delivery systems for weapons of mass destruction) and the Wassenaar Arrangement (covering conventional arms and dual-use technologies).

The Export Control Classification Number (ECCN) classifies the level of export control for any product, software and technology that is exported from the member states of the [Wassenaar Arrangement](#). The ECCN classification that applies to any specific item is determined by referring to a table that is issued for the United States by the [U.S. Department of Commerce Bureau of Industry and Security \(BIS\)](#) and for the European Union by [Regulation 428/2009](#). (cf.: [Wikipedia](#))

EU member states having established their national laws and regulations, for example for Germany this is the Aussenwirtschaftsgesetz and Aussenwirtschaftsverordnung.

Toradex makes no representation or warranty as to the accuracy or reliability of the classifications listed in this Classification Chart below. Any use of such classifications by the customer is at the users’ own risk. It is the legal responsibility of the exporter to comply with the Export Administration Regulations (EAR).

The following classifications are based on unmodified products in original condition, as shipped by Toradex:

PN	Product Name	ECCN	License Exception	Status	Note	TARIC (EU)	Schedule B (US)
00032001	Colibri PXA320 806MHz V2.0B	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00041300	Colibri PXA300 208MHz V1.3A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00051301	Colibri PXA310 624MHz V1.3B	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00062001	Colibri PXA320 806MHz IT V2.0B	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00071300	Colibri PXA300 208MHz XT V1.3A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00082400	Colibri PXA270 312MHz V2.4A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00082402	Colibri PXA270 312MHz V2.4C	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00092400	Colibri PXA270 520MHz V2.4A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00092402	Colibri PXA270 520MHz V2.4C	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00201200	Colibri T20 256MB V1.2A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150

PN	Product Name	ECCN	License Exception	Status	Note	TARIC (EU)	Schedule B (US)
00211200	Colibri T20 512MB V1.2A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00221200	Colibri T20 512MB IT V1.2A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00241200	Colibri T20 256MB IT V1.2A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00231102	Colibri T30 1GB V1.1C	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00231104	Colibri T30 1GB V1.1E	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00301100	Colibri T30 1GB IT V1.1A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00251000	Apalis T30 2GB 1.0A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00251002	Apalis T30 2GB 1.0C	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00251004	Apalis T30 2GB 1.0E	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00261100	Apalis T30 1GB V1.1A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00311100	Apalis T30 1GB IT V1.1A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00121101	Colibri VF61 256MB IT V1.1B	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00121200	Colibri VF61 256MB IT V1.2A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00131100	Colibri VF50 128MB IT V1.1A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00131200	Colibri VF50 128MB IT V1.2A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00101100	Colibri VF50 128MB V1.1A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00101200	Colibri VF50 128MB V1.2A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00141000	Colibri iMX6-Solo 256MB V1.0A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00151000	Colibri iMX6-DualLite 512MB V1.0A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00161000	Colibri iMX6-Solo 256MB IT V1.0A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00161001	Colibri iMX6-Solo 256MB IT V1.0B	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00161002	Colibri iMX6-Solo 256MB IT V1.0C	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00171000	Colibri iMX6-DualLite 512MB IT V1.0A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00321100	Colibri iMX7S 256MB V1.1A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00331100	Colibri iMX7D 512MB V1.1A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00271100	Apalis iMX6-Quad 1GB V1.1A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00271001	Apalis iMX6-Quad 1GB V1.0B	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00281100	Apalis iMX6-Quad 2GB IT V1.1A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00281101	Apalis iMX6-Quad 2GB IT V1.1B	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00291100	Apalis iMX6-Dual 512MB V1.1A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150

PN	Product Name	ECCN	License Exception	Status	Note	TARIC (EU)	Schedule B (US)
01013100	Colibri Evaluation Board V3.1A	EAR99	NLR	Unrestricted	2	8471.80.00.00	8471.80.1000
01021002	Orchid V1.0C	EAR99	NLR	Unrestricted	2	8471.80.00.00	8471.80.1000
01031001	Orchid V1.0B	EAR99	NLR	Unrestricted	2	8471.80.00.00	8471.80.1000
01071001	LVDS Converter 10.4" incl. cable V1.0B	EAR99	NLR	Unrestricted	2	8471.80.00.00	8471.80.1000
01081000	LVDS Converter 15" incl. cable V1.0A	EAR99	NLR	Unrestricted	2	8471.80.00.00	8471.80.1000
01111000	Colibri Fastener V1.0A	EAR99	NLR	Unrestricted	2	8473.30.80.00	8473.30.0002
01151000	Apalis Evaluation Board V1.0A	EAR99	NLR	Unrestricted	2	8471.80.00.00	8471.80.1000
01161100	Apalis T30 Mezzanine V1.1A	EAR99	NLR	Unrestricted	2	8471.80.00.00	8471.80.1000
01191100	Analogue Camera Module V1.1A	EAR99	NLR	Unrestricted	2	8543.70.90.99	8543.70.9655
01331000	Ixora V1.0A	EAR99	NLR	Unrestricted	2	8471.80.00.00	8471.80.1000
01351100	Iris V1.1A	EAR99	NLR	Unrestricted	2	8471.80.00.00	8471.80.1000
01371000	Viola V1.0A	EAR99	NLR	Unrestricted	2	8471.80.00.00	8471.80.1000
12031000	EDT 5.7" TFT VGA w. Touch V1.0A	EAR99	NLR	Unrestricted	2	8528.51.00.90	8528.51.0000
12041000	EDT 7" TFT WVGA w. Touch V1.0A	EAR99	NLR	Unrestricted	2	8528.51.00.90	8528.51.0000
12061000	Cap.Multi-Touch Display 7" V1.0A	EAR99	NLR	Unrestricted	2	8528.51.00.90	8528.51.0000
12071000	Cap.Multi-Touch Display 10" V1.0A	EAR99	NLR	Unrestricted	2	8528.51.00.90	8528.51.0000
21022000	Ambicom WL250N-USB V2.0A	5A992	NLR	Mass Market	1	8517.62.00.90	8517.62.0010
01112000	Colibri Fastener V2.0A	EAR99	NLR	Unrestricted	2	8473.30.80.00	8473.30.0002
21031000	LM006 USB WiFi V1.0A	5A992	NLR	Mass Market	1	8517.62.00.90	8517.62.0010
01371100	Viola V1.1A	EAR99	NLR	Unrestricted	2	8471.80.00.00	8471.80.1000
01371200	Viola V1.2A	EAR99	NLR	Unrestricted	2	8471.80.00.00	8471.80.1000
01421200	Viola Plus V1.2A	EAR99	NLR	Unrestricted	2	8471.80.00.00	8471.80.1000
01192000	Analogue Camera Adapter V2.0A	EAR99	NLR	Unrestricted	2	8543.70.90.99	8543.70.9655
01013200	Colibri Evaluation Board V3.2A	EAR99	NLR	Unrestricted	2	8471.80.00.00	8471.80.1000
01013201	Colibri Evaluation Board V3.2B	EAR99	NLR	Unrestricted	2	8471.80.00.00	8471.80.1000
00151001	Colibri iMX6DL 512MB V1.0B	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00341000	Apalis TK1 2GB V1.0A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00341001	Apalis TK1 2GB V1.0B	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
00341002	Apalis TK1 2GB V1.0C	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150
01431000	Aster V1.0A	EAR99	NLR	Mass Market	2	8471.80.00.00	8471.80.10.00

PN	Product Name	ECCN	License Exception	Status	Note	TARIC (EU)	Schedule B (US)
01431100	Aster V1.1A	EAR99	NLR	Mass Market	2	8471.80.00.00	8471.80.10.00
01331100	Ixora V1.1A	EAR99	NLR	Unrestricted	2	8471.80.00.00	8471.80.1000
00351100	Apalis iMX6D 1GB IT V1.1A	5A992.c	NLR	Mass Market	1	8471.50.00.90	8471.50.0150

Notes:

- (1) **5A992.c:** With exception of embargoed countries Mass Market products may be exported without further license in respect to EAR.
- (2) **EAR99:** Not controlled by other categories, products may be exported without further license.

Export classification information is subject to change without notice.

Sanctions List



In parallel international agreements also impose embargos on certain individuals, entities or countries. The purpose of these regulations is for example controlling the export of military products or chemical weapons.

International agreements enforce economic sanctions against certain countries and regimes, terrorists and other threats to global security, foreign policy or economic interests. These sanctions are to be adhered to even when exporting products that do not require an export license.

Note that Toradex will not deliver any of its products to recipients which are listed on the respective sanctions lists; irrespective whether this being foreign states, organizations or individuals.

Preferential Origin

Worldwide various free trade agreements (FTA) have been set up in order to ease international trade for goods. Examples of such bilateral or multilateral free trade agreement (FTA) are the European Union-Mediterranean Free Trade Area (EU-MED FTA, EMFTA) or the North American Free Trade Agreement (NAFTA).

Goods originating from a country A can usually be imported duty-free or at reduced rates (i.e. customs preference) to another country B if there is a corresponding free trade zone agreement in place between the two parties involved.

In order to qualify for this preferential origin status goods must either be manufactured from raw materials or components which have been grown or produced in the country A or at least undergo a certain amount of working or processing in that country. Depending on the Tariff code of the goods the minimal domestic value required for preferential origin is at 50% to 70% of the value declared in the customs invoice.

For Toradex's products the BOM cost do outweigh the manufacturing costs. Due to the fact that suppliers of electronic components do not provide any certificates of preferential origin for the individual parts none of the products of Toradex is of preferential origin.

Hence Toradex will neither be able to provide you a Certificate of Origin, nor any Long-Term Supplier's Declaration (Langzeitlieferantenerklärung), the latter to be valid for various shipments within a defined period of time.

In case the domestic value added to a product does not reach the required threshold for preferential origin there are still various non-preferential rules applicable, for example for commercial policy measures like anti-dumping duties, trade embargoes, tariff quotas or for trade statistics purposes.

Country of Origin

The term country of origin (COO) refers to the country where the product was made. In the event the product was manufactured in two or more countries, origin is obtained in the country where the last substantial transformation is carried out, resulting in the manufacture of a new product or representing an important stage of manufacture. One such criterion for a substantial transformation of a product is one that results in a change of the six digits HS-code, indicating a new commodity.

Looking at Toradex products all the printed circuit board assembly have a new HS-code compared to the electronics components deployed. Therefore the country of origin stated on the delivery documents of Toradex refers to the location where the products have been assembled.

Please note that the indicated country of origin is not a certificate of preferential origin due to the reasons stated above.

Legal Note

Please note that this document is intended as a source of information only and is not to be considered a source of legal guidance or advice. Any use of the information herein is without recourse to Toradex and is used at your own risk.

Toradex strongly encourages customers to seek competent legal counsel for advice.

July 8th, 2016

Stephan Dubach, CEO