



Ohio Administrative Code Rule 3337-19-60 Export Compliance Policy.

Effective: August 20, 2024

(A) Policy statement

It is the policy of Ohio university that all employees, schools, departments, centers, institutes and divisions must comply with U.S. government export control laws and regulations. No transactions are to be conducted by or on behalf of Ohio university contrary to U.S. export control laws and regulations.

(B) Requirements

Ohio university employees with export responsibilities are required to have a working knowledge of export control laws and regulations, especially those governing their specific job functions, as well as a working knowledge of Ohio university procedures for export compliance.

The primary regulations governing export controls are Export Administration Regulations (EAR) under the jurisdiction of the Department of Commerce, and International Traffic in Arms Regulations (ITAR), enforced by the Department of State. EAR and ITAR, however, are not the only regulations that impact export activity. Employees should review the university's export compliance manual periodically as the myriad of laws and regulations affecting foreign transactions can be complex and penalties for violations can be severe.

The scope of transactions that may be impacted by export control regulations is quite broad and includes more than the transport of tangible items or technology outside the United States. Export control regulations can impact interpersonal relationships within the United States as domestic transfer of technology (EAR) or technical data (ITAR) to foreign nationals can be a "deemed export."

No transactions are to be initiated with individuals on the denied persons lists, special designated nationals or terrorist list, or with any firms owned by or associated with those parties. No exports are



to be made to parties on the entity list.

Ohio university employees outside the U.S. cannot re-export any commodity, technology, or software unless appropriate authorization has been obtained. This includes foreign-produced items that are the direct product of U.S. technology and software or foreign-made items that are subject to national security controls of the U.S. as designated by the commerce control list (CCL).

All Ohio university employees involved in or that are about to be involved in exports and re-exports, traffic, and related functions or activities are required to comply with the training requirements and procedures outlined in Ohio university export compliance program and manual maintained by Ohio university's export compliance committee.

(C) Responsibility, sanctions and penalties

All university employees are responsible for complying with U.S. export laws and regulations. Violations of export control laws and regulations can result in severe civil and/or criminal penalties to both the violating employee(s) and the university, as well as any significant administrative penalties.

(D) Reporting, inquiries

Possible violations and questions, including determination if person or entity is on a denied entity list, should be addressed to:

Ohio university export compliance committee at exportcompliance@ohio.edu.