

UNC Export Compliance Guide For International Travel

Export Controls and sanctions involve the requirement by the U.S. government to obtain a license (authorization) prior to exporting certain items outside of the United States.

- **“Export”** – An actual shipment or transfer out of the United States, including the sending or taking (e.g. hand-carrying) of an item out of the United States, in any manner – e.g. access of software or information by anyone in any location outside of the United States.
- **“Items”** – UNC-owned or sponsored research materials, equipment, technology, information, data, and software – e.g. University laptops and any sponsored research materials or information.
- **Prior to exporting any items out of the country, please consider the following questions:**
 - Is the international destination a comprehensively sanctioned country – i.e. **Belarus, Cuba, Iran, North Korea, Syria, Russia, Ukraine?**
 - Is an Electronic Export Information (EEI) filing required?
 - Is the item(s) I am taking abroad worth **\$2,500 or more?**
 - Are you taking UNC-owned items to **China, Russia, or Venezuela?**
 - Are you bringing or accessing any sponsored research information, data, software, or technology that is restricted from publication or dissemination?
- If the answer to any of these questions is “Yes” contact the [Export Compliance Office](#) as soon as possible before you begin your travel plans (see *Appendix I*).

Antiboycott Rules prohibit U.S. persons from taking certain actions with the intent to comply with, further, or support an unsolicited foreign boycott (see *Appendix II*).

- **“Foreign Boycott”** – Refusing or agreeing to refuse to do business with a boycotted country that is not sanctioned by the United States.

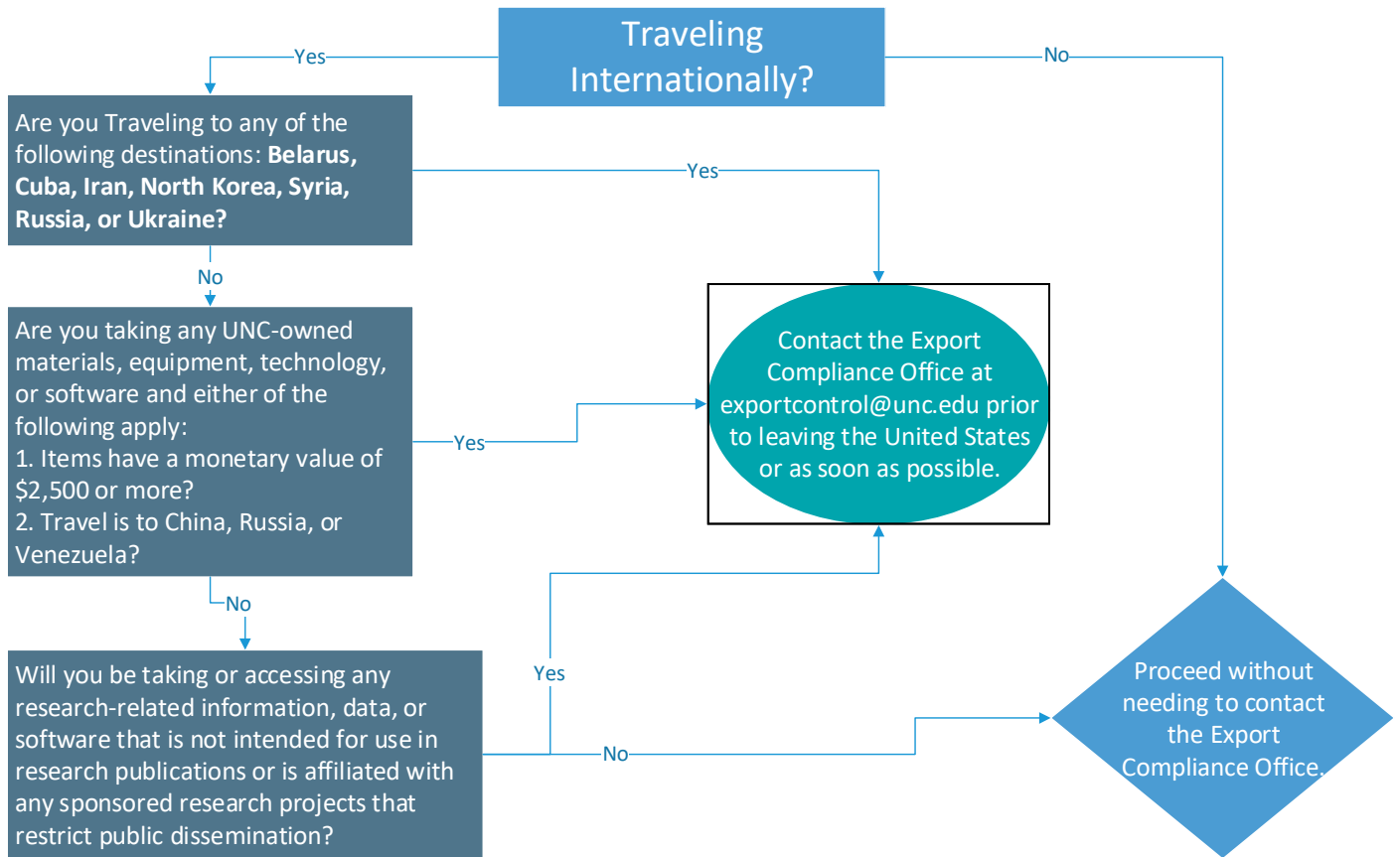
Under the Foreign Corrupt Practices Act (FCPA), U.S. businesses and their agents are prohibited from making corrupt payments to foreign officials to obtain or retain business – i.e. a “Bribe.” (see *Appendix III*)

- **“Corrupt Payment (Bribe)”** - Payments, offers, or promises made for the purpose of:
 - (i) influencing any act or decision of a foreign official in his official capacity,
 - (ii) inducing a foreign official to do or omit to do any act in violation of the lawful duty of such official,
 - (iii) securing any improper advantage; or
 - (iv) inducing a foreign official to use his influence with a foreign government or instrumentality thereof to affect or influence any act or decision of such government or instrumentality.

If you receive a foreign bribe or receive a request to participate in any foreign boycott during your travels, please notify the [Export Compliance Office](#) immediately.

Appendix I

When To Contact The Export Compliance Office Before You Travel Internationally



Appendix II

Examples of Antiboycott Requests


Requests to participate in a foreign boycott may be either written or oral and may include a request to furnish information or enter into/implement an agreement. Written Communications can include, but are not limited to: Emails, Contracts and Purchase Orders, Letters of Credit, Import Documents, Invoices, and Shipping Terms. The following are pertinent examples taken from OAE resources:

- "In the case of overseas suppliers, this order is placed subject to the suppliers being not on the Israel boycott list published by the central Arab League."
- "The Contractor shall, throughout the continuance of the Contract, abide by and comply in all respects with the rules and instructions issued from time to time by the Israel Boycott Office in Iraq."
- "We certify that neither the beneficiaries nor the suppliers of goods and services are subject to boycott."
- "Offeror must not be included by the provisions of Arab Boycott of Israel."
- "Goods of Israeli origin not acceptable."

* For additional examples and scenarios that involved Antiboycott Rules, please visit the U.S. Department of Commerce, Office of Antiboycott Compliance webpage [here](#).

Appendix III

YOU'VE BEEN ASKED TO **PAY A BRIBE** HERE'S WHAT TO DO


DOUBLE-CHECK
 Not all cash payments are bribes. So, first things first: are you absolutely sure you're being asked for a bribe?


YES

NO


STAY COOL
 Keep calm and friendly, and tell the person that you're not sure what they mean. How do they respond to that?

THEY DROP IT


THEY ASK AGAIN



NICE JOB
 Bribery is a crime of opportunity—sometimes just making the person repeat the request can scare them off.


SAFETY FIRST
 Will your life or freedom be in immediate danger if you don't pay what they want?

YES

NO


Use Your Judgment
 If your life or freedom is in danger, use your judgment and do whatever you need to do to get to a safe place as fast as you can.



GET PAPERWORK
 Say you need a copy of the official schedule of fees and an official receipt *before* you can pay. What happens?

THEY SAY NO OR TRY TO STALL

YOU GET IT


**AS SOON AS POSSIBLE,
CALL FOR BACKUP**
 Call [Carolina Ethics Line](tel:866-294-8688) and report what just happened as soon as you're safe—and include as many details as possible.
 866-294-8688


BUY TIME
 This might be a bribe—slow things down by saying you'll need to check with corporate and get back to them.


NOT A BRIBE
 If they give you an official schedule of fees and an official receipt, the charge is legitimate. Go ahead and pay.