**Background**

**The purpose of the Export Controls program is to:**

* Inform employees regarding policy and procedures related to Export Controls
* Establish organization-wide processes to ensure we conduct our technical work in a manner that is in compliance with all regulations
* Provide ongoing education and assistance to employees regarding compliance requirements

**Applicability of Policy “Export Controls"**   
This policy governs related activities of Human Resources, Sourcing, Security, Health & Safety, Contract Administration, Intellectual Property and Information Technology. Principal Investigators, Project / Program Leaders, and others involved with revenue generation at Southern Research are expected to ensure that the appropriate steps are followed regarding the initiation of project work. The Principal investigator or Project/Program Leader of the contract or project is responsible for compliance with the Export Control Plan (ECP). All individuals assigned to work on projects that fall under export control requirements will fall under the requirements of the ECP.

**Policy Statement**

It is the policy of Southern Research to fully comply with all applicable federal statutes, executive orders, regulations, and contractual requirements for the safeguarding of controlled commodities or technical information in its possession. This includes full and total compliance with export control regulations.

Under no circumstances shall employees or other persons associated with Southern Research (e.g. students, visiting scientists, etc.) engage in activities in contravention of U.S. export control laws. The organization’s ECP will serve to demonstrate the appropriate level of security for controlled technologies as it pertains to export control requirements. Employees found to be in willful, intentional violation of these directives or the provisions of the ECP shall be subject to disciplinary actions, up to and including termination of employment. Such violations can also earn civil and/or criminal penalties for Southern Research and/or the individual making the disclosure.

It is unlawful under the export regulations to send or take export controlled information out of the U.S., or to disclose such information, orally or visually, or to transfer export controlled information to a non-U.S. person inside or outside the U.S. without proper authorization. A license may be required for non-U.S. persons to access export controlled information. A non-U.S. person is defined as an individual who is not:

* a U.S. citizen or permanent resident alien;
* a documented refugee residing in the U.S. as a protected political asylee or under amnesty.

The law makes no exceptions for foreign students.

In general, export controlled information means activities, items, information or materials related to the design, development, engineering, manufacture, production, assembly, testing, repair, maintenance, operation, modification, demilitarization, destruction, processing, and use of items with a capacity for military application utility, or any information relating to a contract with dissemination restrictions. In these latter cases, it does not matter if the actual intended end use of export controlled information is military or civil in nature.

Export controlled information does not include basic marketing information on function or purpose; general system descriptions; or information concerning general scientific, mathematical, or engineering principles commonly taught in schools, colleges and universities or information in the public domain.

**Related Topics**

Government Security

Physical Security

Positive Discipline

Termination of Employment

Visitor Access Control