

Section 12 Export Controls
Issued: April 2023
Replaces: December 2021

12.1 Introduction

These Guidelines for University-wide U.S. export control compliance are intended to provide the Office of the President, The Board of Trustees and each SIU campus, with the information and means to coordinate export control policy. They establish the administrative foundation for the export controls compliance program by which SIU will comply with U.S. export control laws. These guidelines are drafted in conjunction with the Export Control Policy, which can be found on the SIU Board of Trustees Policies website at <https://siusystem.edu/board-of-trustees/legislation/board-legislation-policies.shtml#7N>.

12.2 Leadership Responsibilities

Leadership, (SIU President, Chancellors of each SIU campus and the Dean of SIU-School of Medicine) are responsible for being aware of export control issues in their area of responsibility. No individual in a leadership position at SIU shall knowingly engage in an activity or commit the University to engage in an activity that violates U.S. export control laws and regulations. Leadership is responsible for ensuring their areas follow appropriate export control regulations. These individuals are responsible for reviewing the materials on SIU's Export Control Website and consulting with the Director of Export Controls when export controls apply. Leadership acknowledges its responsibility to export control compliance in a "Commitment to Compliance" correspondence located on the SIU System Export Controls website at <https://siusystem.edu/academic-affairs/export-controls/pdf/Letter-to-Community.pdf>.

12.3 Employee Responsibilities

University employees are responsible for being aware of export control issues in their departments and research. Any violation of U.S. export control laws must be reported to their supervisor and the Export Controls Office. Employees are required to participate in export control training when notified by the Export Controls Office. It is the responsibility of the Principal Investigator/Project Office on any project or contract to be aware of the Export Control Policy and to notify the Export Controls Office of potential export control issues. No employee of the SIU community may knowingly engage in any activity or commit the University to engage in any activity that violates U.S. export control laws and regulations. Employees are responsible for reviewing the materials on the SIU System Export Control website and consulting with the Export Controls Office when export controls apply.

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12.8 Transfer of University Intellectual Property

The transfer of University intellectual property can create an export control risk. SIU's central Office of Technology Management and Industry Relations works with SIU faculty, students, and staff to protect and commercialize intellectual property generated from all system campuses. In order to properly comply with U.S. export control laws and regulations, the SIU Export Control Office shall coordinate with the Office of Technology Management and Industry Relations to review agreements and request forms as detailed in the procedures below, as well as any other

export-controlled items and information from unauthorized access, and ensure the research teams understand their compliance obligations and responsibilities.

The Exports Control Office shall assist the Principal Investigator (PI) of the project to develop

12.11 Campus Department Coordination

In order to identify activities and assets which may be subject to export controls, as well as to prevent activities with restricted parties, the Export Controls office shall coordinate with campus departments that may be able to assist in export control activities.

Specific procedures for the coordination with each of these departments shall be documented in the SIU Export Controls Office's written procedures which can be found on the SIU System Export Controls website at <https://siusystem.edu/academic-affairs/export->

A handwritten signature in black ink on a light pink background. The signature is cursive and appears to read "S. A. M. J.". There is a small black square at the bottom right of the signature area.

5/3/2023