

SECTION 7: PRE-BUY REVIEWS

**SUBJECT: US SANCTIONED FOREIGN COUNTRIES AND ENTITIES, PAYMENTS TO
Procedure #7.2.13**

POLICY

All purchases must be conducted in accordance with both Executive Order 13224, which prohibits transactions with individuals and individuals engaged in or supporting terrorism and the Office of Foreign Assets Control Sanctions Program. Any uncertainty regarding whether an individual or organization is prohibited or a country is sanctioned should be resolved by consulting the below Office of Foreign Assets Control Sanctions Program lists of Specially Designated Nationals and Sanctions Programs.

PROCEDURE

Executive Order 13224 prohibits payments to, and transactions with, foreign terrorists by “United States persons,” including the University of Washington. The Office of Foreign Assets Control (OFAC) of the US Department of Treasury maintains a list of foreign terrorists and terrorist organizations with which the UW may not do business.

OFAC also administers and enforces economic and trade sanctions based on US foreign policy and national security goals against certain foreign countries and other entities. Sanctions vary significantly by foreign country. Consult with your manager before entering into a transaction within an individual or organization in one of these countries.

Below are lists of foreign terrorist individuals and organizations and sanctioned countries. If you are unsure regarding whether the individual or organization may be a terrorist individual or entity or whether the organization or individual is from a sanctioned country, check the appropriate list.

Serious penalties may be imposed for failure to comply with Executive Order 13224 or the Sanctions Program and it is the University’s responsibility to ensure that it does not do business

with terrorist individuals or organizations or violate US trade sanctions.

CHECKING FOR FOREIGN TERRORISTS

Check the OFAC “Specially Designated Nationals (SDN) List” to determine if the individual or entity is listed. The website is: <http://www.treas.gov/offices/enforcement/ofac/sdn/t11sdn.pdf>

Do *not* print the above list for reference as it is extensive and is updated regularly.

If an individual or entity appears on the list, do not proceed with the purchase. Consult with your manager.

If the individual or entity does not appear on the list, proceed with the foreign purchase process.

CHECKING FOR FOREIGN SANCTIONED COUNTRIES

Check the OFAC “Sanctions Program and Country Summaries” website to determine if the country is listed: <http://www.treas.gov/offices/enforcement/ofac/programs/index.shtml>

If the country is listed on the website, do not take any further action until you have discussed the matter with your manager.

If the country is not listed, proceed with the foreign purchase process.