SECTION 7: PRE-BUY REVIEWS

SUBJECT: US SANCTIONED FOREIGN COUNTRIES AND ENTITIES, PAYMENTS TO

Procedure #7.2.13

INTRODUCTION

Executive Order 13224, established September 24, 2001, was issued in an effort to block property and prohibit transactions with (or payments to) persons who commit, threaten to commit, or support terrorism. Executive Order 13224 requires that we ensure that foreign countries and entities (which may appear on our purchase requisitions) are not designated by the U.S. government as a terrorist country, government, organization, individual or entity.

The Office of Foreign Assets Control (OFAC) of the US Department of Treasury administers and enforces economic and trade sanctions based on US foreign policy and national security goals against targeted foreign countries and other entities. OFAC provides websites and information for our reference regarding foreign terrorist entities and countries, policies and procedures.

Strict penalties may be imposed for failure to comply with Executive Order 13224.

CHECKING FOR FOREIGN TERRORISTS

It is our responsibility to make best efforts in determining if the vendor is considered by the U.S. government to be a terrorist, part of a terrorist organization or resides in a foreign country with U.S. sanctions for terrorism when contracts are established and payment to the vendor could result.

TO CHECK FOR FOREIGN TERRORIST COUNTRIES

Check the OFAC “Sanctions Program and Country Summaries” website to determine if the country is listed:

- 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.
TO CHECK FOR FOREIGN TERRORIST PERSONS OR ENTITIES

Check the OFAC “Specially Designated Nationals (SDN) List” to determine if the individual or entity is listed. The website is:

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 until you have spoken with your manager.

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