

# Export Control and Sanctions Compliance

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## Purpose

This policy provides guidance to HHMI personnel on compliance with U.S. export control and sanctions laws and regulations.

## Scope

This policy applies to all HHMI personnel.

## Policy

### Generally

HHMI is committed to complying with U.S. export control and sanctions laws and regulations in the conduct of its research and educational activities. These laws and regulations (1) restrict the export of specified items, including certain equipment, software, materials, technology, and services, and (2) prohibit certain interactions with countries, persons and entities against which the U.S. government has issued sanctions or embargoes. (Current lists of sanctioned programs and country information are maintained by the U.S. Department of the Treasury, <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx>.) U.S. export control and sanctions laws and regulations govern and apply to the transfer or export of specified items or technical data outside U.S. borders, including by hand carry or electronic transmission, as well as the release of technology or software to foreign persons or entities within the United States (a “deemed export”). These laws and regulations may also apply with respect to travel outside the United States. In some cases, unless an exception applies, a license may be required prior to travel or any export or deemed export of a controlled item or technology.

Violations of U.S. export control or sanctions laws and regulations can lead to severe civil and criminal penalties against individual researchers and other employees as well as their institutions, so awareness of, and compliance with, these laws is critically important.

Compliance with this policy is a condition of your position with HHMI. Violations of this policy could result in disciplinary action up to and including termination of employment with HHMI.

### At Janelia

HHMI has detailed export control policies in place for its Janelia Research Campus. HHMI personnel working at Janelia may access those policies on the HHMI intranet, and should consult with the Environmental Health and Safety office if they have any questions.

## **For Host-based HHMI Employees**

As part of HHMI's collaboration agreements with its host institutions, each host institution is responsible for compliance by HHMI laboratories at the site with all applicable U.S. export control and sanctions laws and regulations. HHMI Investigators, Freeman Hrabowski Scholars, and other host-based HHMI employees must comply with the export control and sanctions policies, practices and procedures of the host institution at which they work, including attendance at all recommended or mandatory training courses provided by their host institution. An Investigator, Freeman Hrabowski Scholar, or lab member who has a question about U.S. export control or sanctions laws or regulations should contact the office responsible for export control and sanctions compliance at their host institution. In addition, HHMI Investigators, Freeman Hrabowski Scholars, and other host-based HHMI employees need to coordinate with their host institution regarding all proposed international travel to countries that are subject to sanctions, and regarding all proposed exports that may be subject to export controls.

## **Related Procedures, Forms and Policies**

At the Janelia Research Campus, see Janelia's [Export Control Policy](#).

## **Contact**

If you work in or support a lab at Janelia and have questions about this policy, please contact the [HHMI attorney](#) responsible for Janelia. If you work in or support an HHMI lab at a host institution and have general questions about this policy, please contact the [HHMI attorney](#) responsible for the site; substantive questions about export control and sanctions compliance at a host site should be directed to the host institution.

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