

## VANDERBILT UNIVERSITY POLICY ON COMPLIANCE WITH EXPORT CONTROL LAW AND REGULATION

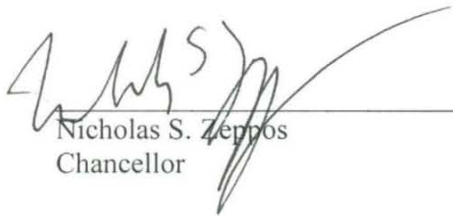
It is the policy of Vanderbilt University to comply with all applicable United States export-control laws and regulations. Export control laws and regulations prohibit the transfer of certain items and information, such as software, equipment, technical data, and other technology and information to anyone outside the U.S., or to foreign nationals, wherever located, without a license from the federal government.

A fundamental principle of the University is that the teaching and research environment should be open so that ideas can be published and exchanged freely among faculty and students. Publications, presentations at professional meetings and student dissertations and theses are an integral part of the University's research mission and should remain unencumbered by external restrictions. However, the University recognizes that instances may arise in which some University research or activities will involve the dissemination of 'technical data', information, materials or equipment that are subject to federal export control regulations and, therefore, dissemination may be restricted by export control laws and regulations.

It is the responsibility of all faculty and staff to understand any export control requirements related to his or her work and to ensure that no exports or transfers are made contrary to those requirements. This includes abiding by both the export rules and regulations set forth by the United States Government as well as any policies and procedures established by the University with respect to those rules and regulations. It also includes understanding the export implications of research and other activities undertaken at the University and obtaining the proper license prior to the export or transfer of any export controlled item, whether abroad or within the U.S. Particularly, University employees must ensure that:

- No item of equipment or biological or chemical material is sent outside the U. S. or to any foreign national (wherever located) without first determining if an export license is required; and, if required, obtaining a license.
- All domestic and international shipments are in conformance with applicable regulations governing the licensing, packaging, and shipment of the material; and
- All transfers of export controlled information or technical data, whether to an individual in a foreign country or to a foreign national in the U.S., are in compliance with applicable export control regulations and University policy.

Failure of any University employee to comply with this Policy on Compliance with Export Control Law and Regulation, and/or the requirements of any applicable export control regulations may result in the imposition of sanctions by appropriate University officials up to and including termination, as well as the possibility of prosecution by the federal government and the imposition of federal, civil, criminal and/or administrative penalties or sanctions.

  
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Nicholas S. Zeppos  
Chancellor

6/1/2009  
Date