MEMORANDUM

DATE: March 15, 2022

TO: University Campus Community

FROM: Lynne Chronister, Vice President for Research and Economic Development

Richard Carter, Associate Vice President for Global Engagement

RE: International Engagement: Sanctions in Response to Government of Russia's

Invasion of Ukraine

On February 21, the U.S. government released imposed sanctions and export control restrictions on Russia and entities supporting the Russian government. These restrictions are likely to change and may affect current or future University collaborations, agreements, research projects, financial transactions, shipments and global engagement. The sanctions impose export, reexport and transfer restrictions on Russia and Belarus, an export/import ban for the Donetsk and Luhansk regions of Ukraine, and finance and banking restrictions. The University community should be aware that financial dealings and physical imports and exports are subject to new sanctions.

If you anticipate or have any connections with Russia, Belarus or the Ukraine related to University activities, please contact the appropriate administrative office for further guidance, as noted below.

ECONOMIC SANCTIONS/RESTRICTED PARTIES: Conducting business or other activities with restricted parties, their subsidiaries or family members may be prohibited or require an export license. The Office of Research Compliance and Assurance can assist in identifying barred parties through Restricted Party Screenings.

EXPORT RESTRICTIONS: The export sanctions are intended to restrict high-level technologies that would advance Russia's defense, maritime, and aviation growth. Items that previously did not require a license now require government authorization. Many items and technologies subject to the Export Administration Regulations are affected, such as computers, semiconductors, telecommunication, encryption security, lasers, sensors, navigation, avionics, propulsion, aerospace, and maritime technologies. The <u>Bureau of Industry and Security's</u> (BIS) Russia Rule Fact Sheet provides a general overview and summary of actions that have been implemented in a final rule making on sanctions against Russia under the Export Control Regulations. [Contact: Angela Williams, aswilliams@southalabama.edu]

FINANCIAL AND BANKING RESTRICTIONS: University students, staff, and faculty are

likely to find that many transactions—payments relating to tuition, external sales, IP licenses, sponsored projects, purchases, credit/debit card use, etc.—involving accounts located in Russia or Belarus are becoming extraordinarily difficult or even impossible to complete. [Contact: Polly Stokley, pstokley@southalabama.edu]

STUDENT AFFAIRS: International students and scholars may be affected by banking restrictions. [Contact: Dan Eckhoff, deckhoff@southalabama.edu]

UNIVERSITY TRAVELER'S: At this time, there are no changes to any education abroad programs or other planned travel. International travel requests to Russia on university-related business will be reviewed by the International Risk Management Committee. The State Department has issued a Travel Advisory for Russia, Level 4 – Do Not Travel, to include updated information regarding the security situation and staffing at the U.S. Embassy. [Contact: Rick Carter, rearter@southalabama.edu]

INFORMATION SECURITY: US institutions of higher learning have seen increased cyberattacks emanating from Russia. These attacks include phishing emails designed to trick you into visiting malicious sites or downloading malware. The USA Office of Information Security provides guidance on how to protect yourself and USA against such malicious emails. [Contact: infosec@southalabama.edu]

CC: Jo Bonner, President

Andi Kent, Interim Executive Vice President and Interim Provost Polly Stokley, Interim Vice President for Finance and Administration Dusty Layton, Executive Director, Research Compliance and Assurance Daniel Eckhoff, Manager, Student Accounting David Furman, Director, Information Security and Risk Compliance