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| [1\_C\_2](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=1_C_2) | From time to time, the U.S. and other countries and jurisdictions (such as the E.U.) restrict or prohibit trade dealings with certain countries, entities, and individuals.  These restrictions may include bans on exports, imports, travel, investments, and other financial dealings with sanctioned parties.  As employees of a U.S.-headquartered company with global business operations, we are required by law to comply with all U.S. trade sanctions programs and controls in every country in which we do business. |  |
| [2\_C\_3](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=2_C_3) | This course provides an overview of U.S. sanctions programs and the types of activities covered by each of them.  It also provides warning signs of potential violations and offers practical advice on how to comply with U.S. trade sanctions.  This course should take approximately 25-30 minutes to complete. |  |
| [3\_C\_4](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=3_C_4) | Upon completion of this course, you will be able to:   * Define trade sanctions, * Explain why U.S. trade sanctions apply to everyone at Abbott, * Describe the three categories of sanctions programs, * List the types of activities that are commonly prohibited, * Explain the importance of screening prospective third-party partners, * Recognize warning signs of potential violations, and * Comply with U.S. trade sanctions. |  |
| [4\_C\_5](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=4_C_5) | The icons at the top of the screen provide one-click access to key resources:   * The table of contents, * Important contact information, and * Reference material.   In addition, you can use the Audio icon to turn the audio on or off and the Exit icon to close the course window. |  |
| [5\_C\_6](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=5_C_6) | There are several features to help guide you through the course:   * Back and Forward arrows allow you to move from screen to screen. * A horizontal slider bar at the bottom of the screen allows you to see where you are in the course. * The table of contents lets you navigate from section to section. |  |
| [6\_C\_7](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=6_C_7) | Knowledge Check  Once you have reviewed the content of this course, you will be required to complete a 10-question Knowledge Check.  The Knowledge Check can be taken at any time by clicking the Table of Contents icon and selecting Knowledge Check. |  |
| [7\_C\_8](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=7_C_8) | In this section, you will learn:   * What trade sanctions are and their purpose, * Why trade sanctions should matter to you, * Why U.S. trade sanctions apply to employees in every country in which Abbott does business, * The types of trade sanctions you need to be aware of, and * The range of activities that may be prohibited. |  |
| [8\_C\_9](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=8_C_9) | Trade Sanctions Defined  Trade sanctions, also known as economic sanctions, are trade restrictions imposed by the government of one or more countries on another country, organization, group, or individual.  For example, one country may restrict certain exports, implement controls over particular goods, freeze or block assets, or prohibit trade dealings with another country, entity, or individual altogether. |  |
| [9\_C\_10](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=9_C_10) | Purpose of Trade Sanctions  Governments impose trade sanctions with the purpose of changing the behavior and policy of targeted countries or individuals that endanger their interests or violate international norms of behavior.  Because trade sanctions make it more difficult or impossible for the country or individual bearing the sanction to trade with the country imposing it, they usually cause negative economic consequences for the targeted countries or individuals.  Trade sanctions are typically imposed to advance foreign policy or national security goals. For example, the U.S. and other countries impose sanctions on countries or individuals that sponsor terrorism, commit human rights violations on their people, or are known drug traffickers. |  |
| [10\_C\_11](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=10_C_11) | Deliberately violating sanctions, or engaging in any activity designed to circumvent them, is a serious criminal offense which can result in severe penalties for companies and individuals, including fines and imprisonment.  As a U.S.-headquartered company, Abbott and its employees are required by law to comply with all U.S. trade sanctions programs and trade controls in every country in which Abbott operates. |  |
| [11\_C\_12](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=11_C_12) | Abbott is committed to conducting business according to the highest legal and ethical standards.  Because of this, all Abbott employees must comply with U.S. trade sanctions programs.  This requirement is reflected in the Code of Business Conduct and Corporate Customs & Trade Compliance (CCTC) policies and procedures.  Click the Did You Know? button below to learn more. |  |
| [12\_C\_12](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=12_C_12) | DID YOU KNOW?  Here is what Abbott Code of Business Conduct says about our adherence to all applicable trade sanctions:  We adhere to all applicable trade regulations, such as export and import controls issued by governments for foreign policy and national security reasons. Trade regulations include sanctions, restrictions on exporting of certain products, and prohibitions on conducting business with certain individuals, groups or entities.  CCTC policies and procedures provide detailed guidance on how to comply with trade sanctions. For a full list of CCTC policies and procedures, please refer to the Resources section of this course. |  |
| [13\_C\_13](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=13_C_13) | U.S. Persons Defined  Those required to comply with U.S. sanctions programs are referred to as “U.S. persons” and include:   * Companies incorporated in or based in the U.S. (including Puerto Rico), * Employees of such U.S. companies (including those based in Puerto Rico), as well as employees of their non-U.S. branches, * U.S. citizens or U.S. permanent residents, regardless of where they are located, * Anyone who is in the U.S., including someone traveling on vacation, and * Any foreign subsidiary of a U.S.-headquartered company or a U.S.-owned or-controlled entity.   In practice, the category of U.S. persons is broad and far-reaching, which is why Abbott requires all employees (including foreign subsidiaries and affiliates and their employees) to comply with these programs. |  |
| [14\_C\_14](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=14_C_14) | Imagine...  Michelle, an account manager at a small French diagnostics company recently acquired by Abbott, receives an order for assays from a customer in Cuba. The U.S. has trade sanctions against Cuba, while France does not.  Since Michelle is a French citizen working for a French subsidiary, and France has no trade sanctions against Cuba, would it be okay for Michelle to fill the order? |  |
| [15\_C\_14](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=15_C_14) | [1] Yes. As a French citizen living in France, Michelle is not defined as a “U.S. person.” Therefore, she is not obligated to comply with the sanctions program.  [2] Yes. While the U.S. trade sanction applies to U.S. companies operating in the U.S, it does not apply to their foreign subsidiaries.  [3] No. Even though Michelle is a French citizen living in France, she is working for a U.S. subsidiary and is therefore required to comply with the U.S. sanctions program.  Submit |  |
| [16\_C\_14](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=16_C_14) | That's correct!  That's not correct!  Even though Michelle isn't a U.S. citizen or resident, her employer is a subsidiary of Abbott. As a result, Michelle and her company are considered “U.S. persons” under the Cuba sanctions program. Therefore, she may not fill the order. |  |
| [17\_C\_15](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=17_C_15) | U.S. Trade Sanctions Are the Focus of This Course  Besides U.S. trade sanctions programs, Abbott may also be subject to sanctions imposed under the local laws of the other countries in which we do business. In addition, the implementation of sanctions mandated by the United Nations or the European Union may also impose restrictions on Abbott.  Because U.S. sanctions apply to employees in every country in which Abbott does business, and because U.S. sanctions are more comprehensive than those imposed by other countries, this course focuses specifically on U.S. trade sanctions programs and the types of activities covered by each program.  If you have questions about trade sanctions programs in other countries, please contact CCTC at [exports@abbott.com](mailto:exports@abbott.com). |  |
| [18\_C\_16](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=18_C_16) | In the U.S., trade sanctions programs are administered and enforced by the U.S. Treasury Department's Office of Foreign Assets Control (OFAC) and U.S. Commerce Department’s Bureau of Industry and Security (BIS) as part of foreign and national security efforts. |  |
| [19\_C\_17](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=19_C_17) | U.S. trade sanctions programs fall into three (3) broad categories:   * Comprehensive sanctions, * Limited sanctions, and * List-based sanctions. |  |
| [20\_C\_18](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=20_C_18) | Comprehensive Sanctions  Comprehensive sanctions prohibit nearly all activities with a sanctioned country or territory including their governments, residents, and entities organized in or operating from the sanctioned country.  Comprehensive sanctions generally prohibit:   * Imports from the sanctioned country, * Exports or re-exports to the sanctioned country, and * Most business and financial dealings with or involving the sanctioned country or its government. |  |
| [21\_C\_18](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=21_C_18) | Comprehensive country sanctions apply to a sanctioned country’s citizens and companies even if they are not directly connected to the government of that country. |  |
| [22\_C\_19](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=22_C_19) | Comprehensive Sanctions, Continued  Sanctioned governments may also own or control companies that are outside their borders. Comprehensive country sanctions generally prohibit “U.S. persons” from engaging in activities with these companies, wherever they are located. |  |
| [23\_C\_20](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=23_C_20) | Countries that are currently subject to U.S. comprehensive sanctions include:   * Cuba, * Iran, * North Korea, * Region of Crimea, and * Syria.   If you plan to conduct business with any of these countries, you should first contact CCTC at [exports@abbott.com](mailto:exports@abbott.com).  Some other countries are subject to limited or targeted sanctions rather than comprehensive sanctions. However, international events may cause the U.S. government to change a country’s status under its sanctions programs. This means some countries that are currently under limited sanctions could face more comprehensive sanctions in the future. |  |
| [24\_C\_21](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=24_C_21) | Limited Sanctions  Limited sanctions are confined to certain activities or specifically named targets. For example, limited sanctions might just restrict the import and export of products designed for military purposes. Or, they might only target government officials involved in violent or terrorist acts.  Currently, the countries subject to such limited U.S. sanctions programs include:   * Sudan and * Venezuela.   As mentioned earlier, sanctions programs can change in response to international events. If you are unsure of the status of a particular country, check with CCTC at [exports@abbott.com](mailto:exports@abbott.com). |  |
| [25\_C\_22](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=25_C_22) | List-based Sanctions  The majority of recent U.S. government sanctions are list-based sanctions that target individuals or entities in certain countries  These individuals or entities are typically involved in terrorism, drug trafficking, nuclear proliferation, or acting for or on behalf of targeted countries. They are designated to an OFAC list of Specially Designated Nationals and Blocked Persons (“SDNs”).  Collectively, all these targeted entities, organizations, and people are commonly referred to as restricted, denied, or prohibited parties  OFAC publishes the SDN list, which includes over 6,000 names of companies and individuals. The SDN list is dynamic and is updated constantly. |  |
| [26\_C\_23](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=26_C_23) | List-based Sanctions, Continued  The SDNs may move from country to country, and U.S. persons are prohibited from dealing with them wherever they are located.  In addition, any entity owned 50 percent or more by one or more SDNs is also considered a prohibited party regardless of whether that entity is designated by name on the SDN list. U.S. persons are prohibited from engaging in nearly all activities with such entities. |  |
| [27\_C\_24](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=27_C_24) | The BIS and the U.S. Department of State also maintain lists of restricted parties, including the Denied Persons List, the Entity List, the Unverified List, and the Debarred Party List.  Later in this course, you will learn about screening your prospective and existing trade partners against the various restricted party lists. |  |
| [28\_C\_25](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=28_C_25) | Pedro, a sales manager at Abbott, is conducting restricted party screening on Medicosa Limitada, a prospective new distributor in Colombia. Although the company does not appear on any restricted party list, the customer profile states that the company is partially owned by a notorious drug kingpin, who is on OFAC’s list of SDNs.  Assuming Medicosa Limitada does not appear on any restricted party list, would it be okay to do business with this company? |  |
| [29\_C\_25](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=29_C_25) | [1] Yes, probably. Since the company itself does not appear on any restricted party list, it is ok to do business with it.  [2] No, probably not. Even though the company is not on any restricted party list, it appears to be owned by an SDN. |  |
| [30\_C\_25](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=30_C_25) | Even though the company itself is not named on the restricted party lists, it appears to be owned by an SDN and requires further investigation. |  |
| [31\_C\_26](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=31_C_26) | There are a number of activities that are prohibited or restricted by sanctions programs.  Let’s take a look at the main activities covered by sanctions and discuss how they relate to Abbott’s business. |  |
| [32\_C\_27](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=32_C_27) | Exportation and Re-exportation  Many sanctions programs make it illegal to export goods, services, software, or technology to a sanctioned country or to trade with a denied party. Export bans prohibit not only direct exports to a sanctioned country, but also indirect exports or re-exports through a third, non-sanctioned country. |  |
| [33\_C\_28](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=33_C_28) | Exportation and Re-exportation, Continued  Many programs have exemptions and general authorizations that may allow you to export the following even when other exports are prohibited:   * Informational materials, personal baggage, clothing, cosmetics, and other personal belongings (if traveling) and * Certain food, medicine, and medical devices under a humanitarian exception.   These exemptions are narrow, do not apply in the same way in every program, and, in most cases, special licensing is required. Before any export or re-export of food, medicines, or medical devices under a sanctions program, contact CCTC at [exports@abbott.com](mailto:exports@abbott.com) for approval. |  |
| [34\_C\_29](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=34_C_29) | Bruno, an Abbott sales rep, is attending a trade show in the U.S. He is approached by Ashley, an Irish distributor, regarding a sales opportunity in Iran. Ashley proposes that Bruno sell and ship the product to her in Ireland, and then she will handle the shipment to Iran.  Would it be okay to proceed with the export? |  |
| [35\_C\_29](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=35_C_29) | [1] Yes, probably, as Abbott would be exporting directly to Ireland, and Ireland is not on the list of countries targeted by U.S. sanctions.  [2] No, probably not, because even though export to Ireland is not banned by the U.S. government, export to Iran is, and Iran is the ultimate destination for Bruno’s product. |  |
| [36\_C\_29](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=36_C_29) | Even though Bruno is shipping the product to Ireland, he knows that the product will be re-exported to Iran – a U.S. sanctioned country. This is a violation of U.S. export bans that prohibit not only direct exports to a sanctioned country like Iran, but also indirect exports or re-exports through a third, non-sanctioned country, like Ireland, with the knowledge that they will be re-exported to Iran.  The sanctions cannot be avoided by trans-shipping goods through another country or selling via a distributor. |  |
| [37\_C\_30](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=37_C_30) | Importation  Most trade sanctions programs prohibit the importation of goods and services directly from sanctioned countries into the U.S., and more broadly prohibit any dealings, anywhere, related to products or services that originate from sanctioned countries. This includes return of exported products that entered the sanctioned country’s stream of commerce.  The prohibition extends to indirect imports of sanctioned country goods that travel through a non-sanctioned country.  The restriction also applies to goods made from raw materials or component parts from a sanctioned country. |  |
| [38\_C\_30](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=38_C_30) | For Abbott purposes, importation prohibitions apply equally to Abbott affiliates, subsidiaries, and employees importing goods and services from targeted countries into any countries where Abbott does business.  If you have any questions regarding sanctions-related import controls, please contact CCTC at [exports@abbott.com](mailto:exports@abbott.com). |  |
| [39\_C\_31](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=39_C_31) | Business Travel  U.S. citizens are legally permitted to travel to most sanctioned countries.  However, some sanctions programs make it illegal to spend money or conduct certain activities in a sanctioned country without a license from OFAC. Even with proper licensing in place, certain in-country activities such as sales strategy meetings or promotional discussions are still prohibited.  So, as an Abbott employee located anywhere in the world, you must consult with CCTC at [exports@abbott.com](mailto:exports@abbott.com) before you travel on business to any sanctioned country. |  |
| [40\_C\_32](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=40_C_32) | Facilitation of Activities by Others  Foreign trade controls and sanctions programs generally include a ban against facilitating activities by others. This ban makes it illegal to assist a non-U.S. person or company in any transaction that you, as a U.S. person (or employee of a U.S.-headquartered company), are not permitted to participate in yourself.  For example, a U.S. company is prohibited from referring business with sanctioned countries to foreign companies or subsidiaries that are not subject to U.S. sanctions. |  |
| [41\_C\_33](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=41_C_33) | Gina works in Buenos Aires for Abbott Argentina. She has seen the opportunity for expansion into Cuba but knows that unauthorized trade with Cuba remains prohibited under U.S. trade sanctions.  Sergio, an Argentinian national, who works for an Argentinian marketing company, is heavily involved in the Cuban market. He approaches Gina about working on Abbott’s behalf to open up opportunities in the Cuban market in anticipation of the lifting of sanctions against Cuba. Gina is excited by the chance to get ahead of potential U.S. rivals in Cuba and agrees to refer business to Sergio’s company to gain a foothold in the Cuban market.  Would it be okay? |  |
| [42\_C\_33](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=42_C_33) | [1] Yes, probably, as the business with Cuba will be conducted by a third party whose company and country, Argentina, is not covered by the U.S. ban on trade with Cuba.  [2] No, probably not, as it is still illegal for a U.S. company to use a third party to facilitate business with a targeted country like Cuba, even if that third party is not covered by the U.S. ban on trade with Cuba. |  |
| [43\_C\_33](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=43_C_33) | Even though Gina intends to use a third party who is not subject to U.S. trade sanctions, as an employee of a U.S. company, she is not permitted to refer business with sanctioned countries to foreign companies who are not required to comply with U.S. sanctions. |  |
| [44\_C\_34](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=44_C_34) | Attempting to Circumvent Sanctions  Similar to prohibiting the facilitation of activities, most sanctions programs make it illegal to help someone avoid the sanctions rules. For example, advising someone on how to structure a transaction so that it avoids or evades the sanctions laws is in itself a sanctions violation.  However, giving a basic explanation of what the sanctions laws say is not a sanctions violation, as long as you do not offer strategic advice on how to avoid those laws.  The only legal way to do business with a sanctioned country without violating the sanctions program and Abbott policy is to get a license from the Office of Foreign Assets Control (OFAC) or Bureau of Industry and Security (BIS) to engage in authorized activities. Contact CCTC at [exports@abbott.com](mailto:exports@abbott.com) for any activity involving sanctioned countries. |  |
| [45\_C\_35](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=45_C_35) | As mentioned earlier, both U.S. law and Abbott policy require every Abbott employee (including those of our foreign subsidiaries and affiliates) to comply with U.S. trade sanctions regulations.   * Why screening prospective third-party partners is important, * What to watch out for in the normal course of your business, and * Some practical things you can do in order to ensure you comply with U.S. trade sanctions. |  |
| [46\_C\_36](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=46_C_36) | Importance of Screening Trade Partners  Earlier in this course, you have learned that U.S. law prohibits doing business with any person or organization that is an SDN or is on a restricted party list.  All Abbott affiliates globally must screen their prospective trade partners, customers, vendors, banks, health care professionals, principal investigators, speakers, recipients of donations, etc. against all applicable and relevant restricted party lists.  In addition, all Abbott affiliates globally must continue to screen their existing trade partners on an ongoing basis to ensure that they are not subsequently added to a restricted party list after the initial screening has been completed. |  |
| [47\_C\_37](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=47_C_37) | Denied Party Screening System  Screening is critical for compliance with sanctions.  To help you conduct screening, Abbott’s CCTC department has implemented a system that makes screening easy and efficient. This system allows you to screen a name or entity against the current restricted party lists, and once a name/entity is uploaded, the system automatically re-screens it whenever the lists are updated.  To obtain access to the system and instructions on how to use it, please contact [CCTC\_DPS@abbott.com](mailto:CCTC_DPS@abbott.com). |  |
| [48\_C\_37](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=48_C_37) | The Denied Party Screening Procedure (CCTC8990.09.001) provides guidelines for complying with the denied party screening requirements and applies to all subsidiaries and divisions of Abbott globally. |  |
| [49\_C\_38](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=49_C_38) | What to Do if You Find a Name on a Restricted Party List  If screening reveals that a name or an entity appears on a restricted party list as an exact match, you should proceed with extreme caution.  You should immediately suspend transactions involving the person or entity listed and contact CCTC at [CCTC\_DPS@abbott.com](mailto:CCTC_DPS@abbott.com) for further due diligence.  Most (but not all) transactions with denied parties are prohibited. Each country’s specific sanctions program has exceptions, exemptions, and licensed activities that may permit a particular transaction to go forward.  To learn more about Abbott’s Denied Party Screening requirements, click [here](https://abbott.sharepoint.com/sites/abbottworld/Customs_TradeCompliance/Pages/DeniedPartyScreening.aspx) to access the Denied Party Screening page on Abbott World or [here](https://abbottlabs-lcec.lrn.com/custom/denied_party_screening.pdf) if you work for Abbott Rapid Diagnostics. |  |
| [50\_C\_39](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=50_C_39) | During the normal course of your business, watch out for red flags that can warn you of a potential violation of a trade sanctions program or might indicate that a product is destined for an unintended end-use, end-user, or end destination. |  |
| [51\_C\_40](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=51_C_40) | Identifying a red flag does not mean that the transaction cannot or should not proceed, but it does warn you of suspicious circumstances that need to be investigated before proceeding further.  Turning a blind eye to red flags and proceeding with a transaction with knowledge that a violation has occurred or is about to occur is in itself a violation of the regulations.  For example, if the end-user hospital name indicates possible connections with a sanctioned country (such as "Cuban Hospital" located in Qatar), this should be treated as a red flag that requires further investigation before proceeding. |  |
| [52\_C\_41](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=52_C_41) | Here are some other red flags you should watch out for:   * A customer declines routine installation, training, or maintenance service for a product that she has recently purchased (e.g., a diagnostic analyzer); * A customer is willing to pay cash for an item that would normally be paid for in installments; * You notice a large unexplained increase in orders from a customer.   The list above isn’t all-inclusive, so always be on alert for other possible red flags. Additional examples of red flags can be found in the Corporate Finance Policy CFM 8990 – U.S. Export and Foreign Trade Control Laws and Regulations.  If you do notice any red flags, contact CCTC at [exports@abbott.com](mailto:exports@abbott.com) for further instructions. |  |
| [53\_C\_42](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=53_C_42) | Which of the following are red flags that should alert you that you may be dealing with a sanctioned country or person?  Select all that apply and click the Submit button below.  A company based in Rome that has connections to Iran asks you to ship an order to Turkey, one of Iran's neighbors.  You meet with the customer in Belgium. His company is called International Trade Co. of Syria.  A freight-forwarding firm is listed as a product's final destination.  A shipping route is abnormal or unusual for the product and destination.  A purchasing agent is reluctant to provide you with information about the final destination of some nutritional product you are selling.  Orders for assays come from a location different from the location to which you sold the analyzer product. |  |
| [54\_C\_42](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=54_C_42) | Try Again  That’s not correct!  That’s partially correct!  That’s correct!  Please review your answer choice(s) and click the Try Again button above.  These are all examples of red flags that should alert you that you may be dealing with a sanctioned country or person.  Click the forward arrow to continue. |  |
| [55\_C\_43](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=55_C_43) | Violations of the U.S. sanctions programs may result in civil penalties of more than U.S. $300,000 per violation and criminal penalties of up to $1 million per violation.  Other consequences such as negative publicity and loss of export privileges may also occur.  Self-disclosing a violation is a significant mitigating factor in terms of reducing penalties, so if you are aware of any potential violations, immediately contact CCTC at +1-224-668-9585 or +1-224-279-7612, or Legal Regulatory & Compliance at +1-224-668-9161. |  |
| [56\_C\_44](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=56_C_44) | As mentioned earlier, trade sanctions programs are complicated and can change in response to international events.  CLICK EACH OF THE PANELS TO LEARN WHAT YOU CAN DO TO FULLY COMPLY WITH ALL U.S. FOREIGN TRADE CONTROLS AND SANCTIONS PROGRAMS. |  |
| [57\_C\_44](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=57_C_44) | Follow Policies and Procedures  Be aware of and follow Abbott’s policies and procedures for processing and reviewing business activities that could be affected by sanctions programs. |  |
| [58\_C\_44](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=58_C_44) | Watch Out for Red Flags  Always watch out for red flags indicating potential sanctions violations. |  |
| [59\_C\_44](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=59_C_44) | Stop the Transaction  If you spot a red flag, immediately stop the transaction and contact CCTC at [exports@abbott.com](mailto:exports@abbott.com) for guidance. |  |
| [60\_C\_44](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=60_C_44) | Screen Trade Partners  Always screen prospective trade partners, customers, vendors, health care professionals, etc. against all applicable and relevant restricted party lists, and ensure that existing partners are screened on an ongoing basis. |  |
| [61\_C\_44](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=61_C_44) | Raise Questions and Concerns  If you have any questions or concerns about sanctions, raise them immediately with CCTC at [exports@abbott.com](mailto:exports@abbott.com). |  |
| [62\_C\_45](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=62_C_45) | If you have any questions or would like to learn more about sanctions programs, please contact Corporate Customs & Trade Compliance (CCTC):  Phone: +1-224-668-9585 or +1-224-279-7612  Email: [exports@abbott.com](mailto:exports@abbott.com)  Website:   * On Abbott World: [Customs & Trade Compliance](https://abbott.sharepoint.com/sites/abbottworld/Customs_TradeCompliance/Pages/Home.aspx) * On Abbott World Rapid Diagnostics: [Customs & Trade Compliance](https://www.onealere.com/en-us/Pages/Legal-Compliance-Policies.aspx)   If you have any concerns about a potential violation, immediately contact CCTC at +1-224-668-9585 or +1-224-279-7612, or Legal Regulatory & Compliance at +1-224-668-9161. |  |
| [63\_C\_46](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=63_C_46) | MANAGER OR SUPERVISOR  If you spot a red flag when dealing with a trade partner, have concerns related to attempts by anyone to circumvent sanctions, or if you have general questions about trade sanctions programs, always speak to your manager. Your manager knows you and your work environment and should be able to help you address the situation appropriately. You can also talk to your manager if you have questions on how this course applies to your specific job responsibilities. |  |
| [64\_C\_46](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=64_C_46) | WRITTEN STANDARDS   * Review Abbott’s [Code of Business Conduct](http://www.abbott.com/investors/governance/code-of-business-conduct.html) for guidance on complying with all applicable trade regulations. * Refer to the following corporate policies and procedures for processing and reviewing business activities that could be affected by sanctions programs. Click [here](https://abbott.sharepoint.com/sites/abbottworld/Customs_TradeCompliance/Pages/Policies-and-Procedures.aspx) to access the documents on Abbott World, or click [here](https://www.onealere.com/en-us/Pages/Legal-Compliance-Policies.aspx) to access the documents on Abbott World Rapid Diagnostics. * Corporate Legal Policy 60-3 – U.S. Foreign Embargo & Trade Control Laws * CFM 8990 – U.S. Export and Foreign Trade Control Laws and Regulations * CCTC8990.01.001 – Deemed Export Controls * CCTC8990.03.001 – BIS Export / Reexport License Requests * CCTC8990.09.001 – Denied Party Screening Procedure * CCTC8990.10.001 – OFAC Licensing Procedure * CCTC8990.10.003 – Commercial Activities Involving OFAC General Licenses * CCTC8990.10.004 – Interactions with Healthcare Professionals and Sanctioned Countries * CCTC8990.11.001 – Export Control Classification Number Classifications |  |
| [65\_C\_46](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=65_C_46) | CORPORATE CUSTOMS & TRADE COMPLIANCE (CCTC)   * The CCTC is a corporate resource available to address your questions or concerns about trade sanctions programs. If you have any questions or would like to learn more about sanctions programs, please contact CCTC: * Phone: +1-224-668-9585 or +1-224-279-7612 * Email: [exports@abbott.com](mailto:exports@abbott.com) * Website: * On Abbott World: [Customs & Trade Compliance](https://abbott.sharepoint.com/sites/abbottworld/Customs_TradeCompliance/Pages/Home.aspx) * On Abbott World Rapid Diagnostics: [Customs & Trade Compliance](https://www.onealere.com/en-us/Pages/Legal-Compliance-Policies.aspx) * If you have any concerns about a potential violation, immediately contact CCTC at +1-224-668-9585 or +1-224-279-7612, or Legal Regulatory & Compliance at +1-224-668-9161. |  |
| [66\_C\_46](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=66_C_46) | LEGAL DIVISION  Contact the Legal Division at +1-224-668-9161 with questions or concerns about legal implications of potential trade sanctions violations. |  |
| [67\_C\_46](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=67_C_46) | OFFICE OF ETHICS AND COMPLIANCE (OEC)  The OEC is a corporate resource available to address your questions or concerns about our company’s values and standards of conduct.   * Visit the [Contact OEC](https://abbott.sharepoint.com/sites/abbottworld/EthicsCompliance/About/Pages/Contacts.aspx) page on the [OEC website](https://abbott.sharepoint.com/sites/abbottworld/EthicsCompliance/Pages/Home.aspx) on Abbott World. * Visit the [Contact OEC](https://www.onealere.com/en-us/Pages/Contact-OEC.aspx) page on the [OEC website](https://www.onealere.com/en-us/functional-resources/office-of-ethics-and-compliance) on Abbott World Rapid Diagnostics.   Visit our multilingual ethics and compliance [Speak Up Helpline](http://speakup.abbott.com/) available globally 24/7 to voice your concerns about a potential violation of our company’s values and standards of conduct. |  |
| [68\_C\_47](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=68_C_47) | Course Transcript  Click [here](file:///D:\development\AbbottTradeSanctions\courses\us\translation\reference\Transcript.pdf) for a full transcript of the course. |  |
| [69\_C\_48](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=69_C_48) | The Knowledge Check that follows consists of 10 questions. You must score 80% or higher to successfully complete this course.  When you are ready, click the Knowledge Check button. |  |
| [70\_C\_49](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=70_C_49) | Julie is a U.S. citizen and an Abbott employee in Canada. She is asked to arrange a trip to Cuba for a group of her Canadian colleagues, including booking hotel accommodations in Havana and some tourism. Canada has no economic sanctions against Cuba. Is it okay for Julie to arrange this trip?  [1] Yes.  [2] No. |  |
| [71\_C\_49](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=71_C_49) | There are several reasons why Julie must refrain from any involvement in arranging the travel:   * As a U.S. citizen, Julie is considered a “U.S. person” and is subject to trade sanctions against Cuba, regardless of where she resides. * As a U.S. person, Julie may not assist non-U.S. persons to travel to Cuba for business or any purpose. * As an employee of Abbott – a U.S. company – Julie is required to comply with all U.S. trade sanctions programs and controls in every country in which Abbott does business. |  |
| [72\_C\_49](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=72_C_49) | James, an Abbott Business Development Manager in the U.S., received a request for export of goods and services to Iran. He was aware of the general restriction against U.S. exports to Iran, so he passed along the business to his colleague in Spain. Is this OK? |  |
| [73\_C\_49](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=73_C_49) | James should not have referred the business to his colleague in Spain because:   * Using a subsidiary to have dealings with a sanctioned country, like Iran, is considered facilitation of activities by others, and is prohibited. Even referring the business to the subsidiary likely violates the OFAC sanctions, even if the subsidiary never actually engages in any Iran business. The prohibition on facilitation makes it illegal to assist a non-U.S. person or company in any transaction that you, as a U.S. person (or employee of a U.S.-headquartered company), are not authorized or permitted to participate in yourself. * Because James’ colleague is an employee of Abbott – a U.S. company – just like James, he or she is required to comply with all U.S. trade sanctions programs and controls in Spain and in every country in which Abbott does business. |  |
| [74\_C\_49](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=74_C_49) | Which of the following are considered U.S. persons who must comply with U.S. trade sanctions?  Check all that apply.  [1] A U.S. citizen who resides permanently in Israel.  [2] The Paris affiliate of a U.S. company.  [3] A Mexican company located in Juarez that sells primarily to the U.S.  [4] A Danish citizen visiting the U.S. while on vacation. |  |
| [75\_C\_49](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=75_C_49) | U.S. trade sanctions apply to all "U.S. persons." The definition of a U.S. person applies to:   * Companies incorporated in or based in the U.S. (including Puerto Rico), * Employees of U.S. companies (including those based in Puerto Rico), as well as employees of their non-U.S. affiliates, * U.S. citizens or U.S. permanent residents, regardless of where they are located, * Anyone who is in the U.S., including someone traveling on vacation, and * Any foreign subsidiary of a U.S.-headquartered company or a U.S.-owned or-controlled entity.   So, the U.S. citizen living in Israel, the Paris affiliate of the U.S. company, and the Danish citizen while in the U.S. on vacation are all categorized as “U.S. persons.” But the Mexican company in Juarez is not, even though it trades with the U.S. |  |
| [76\_C\_49](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=76_C_49) | Which of the following actions by a U.S. company are likely to violate U.S. trade sanctions?  [1] Exporting goods to France, knowing they will be re-exported to North Korea.  [2] Sending food and medicine to a sanctioned country without OFAC licensing.  [3] Selling to a company owned by an SDN.  [4] Selling equipment to a research institute affiliated with the government of Iran. |  |
| [77\_C\_49](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=77_C_49) | All of these actions are likely to violate U.S. trade sanctions.   * A U.S. company cannot use a non-sanctioned country, like France, to re-export goods to a sanctioned county, like North Korea. * Exports of food and medicine to a sanctioned country for humanitarian reasons may be permitted, but only with appropriate licensing from OFAC or BIS. * U.S. trade sanctions prohibit selling to a company owned 50% or more by an SDN. * It is a violation of U.S. sanctions to sell equipment to a company that has an affiliation with a sanctioned country, like Iran. |  |
| [78\_C\_49](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=78_C_49) | Istanbul Distributors, organized under the laws of Turkey, is a customer of Abbott. Istanbul Distributors places an order with Abbott for five (5) diagnostic devices. The purchasing agent specifically requests that all the labelling and packaging for the shipment be in Farsi because the devices are intended for re-export to Iran. Which of the following is true?  [1] Abbott may sell the devices to Istanbul Distributors because Turkey does not impose economic sanctions on Iran.  [2] Abbott may sell the devices to Istanbul Distributors as long as none of the documents relating to the transaction indicate that the devices are intended for re-export to Iran.  [3] Abbott may not sell the devices to Istanbul Distributors without a license because Abbott knows that the devices are intended for re-export to Iran. |  |
| [79\_C\_49](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=79_C_49) | Sending goods from the U.S. to a non-sanctioned country, like Turkey, with the intention of re-exporting them into a targeted country, like Iran, would be a violation of the U.S. sanctions program. Abbott may not sell the devices without a license to Istanbul Distributors because Abbott knows that the devices are intended for re-export to Iran. Even without explicit knowledge that the devices are destined for Iran, the request for Farsi labelling is a red flag that would require us to ask questions about the intended end-destination. |  |
| [80\_C\_49](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=80_C_49) | Trade sanctions are always imposed against countries and not individuals or entities. |  |
| [81\_C\_49](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=81_C_49) | While trade sanctions can be imposed against countries, they can also be imposed against individuals and entities suspected of illegal activity. This can help prevent the spread of criminal enterprises. Governments of various countries maintain the details of these persons and entities on lists, and any sanctions against them are called list-based sanctions. |  |
| [82\_C\_49](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=82_C_49) | Which of the following could happen to a U.S.-based company that imports refurbished medical equipment marked "Made in Iran” from Europe-based Iranian doctors?  [1] Nothing. The goods are imported from Europe, not Iran.  [2] If the imports are not properly licensed, the company may have to pay a fine of more than U.S. $300,000 per violation.  [3] If there is evidence that the owners of the company are intentionally hiding the true country of origin, they may be prosecuted and, if convicted, imprisoned and fined. |  |
| [83\_C\_49](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=83_C_49) | OFAC rules generally prohibit imports from Iran. Violations of U.S. sanctions may result in civil penalties of more than U.S. $300,000 per violation. Also, if the violation is found to be criminal in nature, higher penalties and potential imprisonment may apply. |  |
| [84\_C\_49](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=84_C_49) | You have screened a prospective customer against all applicable and relevant restricted party lists. The customer does not appear on any of the lists. Your manager shares a red flag she identified about the customer. You decide not to look into the red flag because you have already screened the customer. Is this OK? |  |
| [85\_C\_49](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=85_C_49) | Red flags warn you of suspicious circumstances that need to be investigated before proceeding. If you do not investigate the red flag and end up doing business with a restricted party, you can be found guilty of violating U.S. trade sanctions laws, even if your violations are unintended. |  |
| [86\_C\_49](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=86_C_49) | Which of the following should warn you that a transaction could potentially violate U.S. trade sanctions laws?  [1] A customer requests an order to be delivered to an unusual location.  [2] A customer insists on paying cash for an expensive item that would normally be paid for in installments.  [3] The name of the company you are dealing with indicates possible ties with a sanctioned country.  [4] A product's technical specifications do not fit the technical specifications of products typically found in the country it is being shipped to.  [5] All of the above. |  |
| [87\_C\_49](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=87_C_49) | All of these actions should raise red flags or warning signals as they all indicate potential violations of U.S. trade sanctions laws. |  |
| [88\_C\_49](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=88_C_49) | Who should you contact if you have any questions or would like to learn more about sanctions programs?  [1] Human Resources (HR)  [2] Corporate Customs & Trade Compliance (CCTC)  [3] Public Affairs  [4] Legal Regulatory & Compliance (LR&C) |  |
| [89\_C\_49](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=89_C_49) | If you have questions or would like to learn more about sanctions programs, please contact Corporate Customs & Trade Compliance (CCTC) and Legal Regulatory & Compliance (LR&C) at [exports@abbott.com](mailto:exports@abbott.com).  All questions remain unanswered |  |
| [90\_C\_50](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=90_C_50) | No results are available as you have not completed the Knowledge Check.  Congratulations! You have successfully passed the Knowledge Check and completed the course.  Please review your results below by clicking on each question.  Once you are done, you must click the EXIT [X] icon in the course title bar before closing your browser window or browser tab. |  |
| [91\_C\_50](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=91_C_50) | Sorry, you did not pass the Knowledge Check. Take a few minutes to review your results below by clicking on each question.  You must score 80% or higher to successfully complete this course.  When you are done, click the Retake Knowledge Check button. |  |
| [92\_toc\_1](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=92_toc_1) | Introduction |  |
| [93\_toc\_2](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=93_toc_2) | Welcome |  |
| [94\_toc\_3](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=94_toc_3) | Objectives |  |
| [95\_toc\_4](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=95_toc_4) | Tutorial |  |
| [96\_toc\_5](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=96_toc_5) | The Basics of Trade Sanctions |  |
| [97\_toc\_6](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=97_toc_6) | Overview |  |
| [98\_toc\_7](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=98_toc_7) | What Trade Sanctions Are |  |
| [99\_toc\_8](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=99_toc_8) | Why Trade Sanctions Should Matter to You |  |
| [100\_toc\_9](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=100_toc_9) | Abbott’s Commitment to Compliance |  |
| [101\_toc\_10](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=101_toc_10) | U.S. Trade Sanctions Apply to Everyone at Abbott |  |
| [102\_toc\_11](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=102_toc_11) | Who Administers Trade Sanctions in the U.S. |  |
| [103\_toc\_12](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=103_toc_12) | Types of Trade Sanctions |  |
| [104\_toc\_13](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=104_toc_13) | Activities Covered Under Trade Sanctions |  |
| [105\_toc\_14](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=105_toc_14) | Complying with Trade Sanctions |  |
| [106\_toc\_15](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=106_toc_15) |  |  |
| [107\_toc\_16](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=107_toc_16) | Denied Party Screening |  |
| [108\_toc\_17](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=108_toc_17) | Red Flags |  |
| [109\_toc\_18](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=109_toc_18) | Consequences of Trade Sanctions Violations |  |
| [110\_toc\_19](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=110_toc_19) | What to Do |  |
| [111\_toc\_20](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=111_toc_20) | Where to Go for Help and Support |  |
| [112\_toc\_21](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=112_toc_21) | Resources |  |
| [113\_toc\_22](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=113_toc_22) | Where to Get Help |  |
| [114\_toc\_23](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=114_toc_23) | Reference Material |  |
| [115\_toc\_24](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=115_toc_24) |  |  |
| [116\_toc\_25](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=116_toc_25) |  |  |
| [117\_toc\_26](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=117_toc_26) |  |  |
| [118\_toc\_27](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=118_toc_27) | Question 1 |  |
| [119\_toc\_28](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=119_toc_28) | Question 2 |  |
| [120\_toc\_29](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=120_toc_29) | Question 3 |  |
| [121\_toc\_30](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=121_toc_30) | Question 4 |  |
| [122\_toc\_31](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=122_toc_31) | Question 5 |  |
| [123\_toc\_32](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=123_toc_32) | Question 6 |  |
| [124\_toc\_33](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=124_toc_33) | Question 7 |  |
| [125\_toc\_34](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=125_toc_34) | Question 8 |  |
| [126\_toc\_35](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=126_toc_35) | Question 9 |  |
| [127\_toc\_36](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=127_toc_36) | Question 10 |  |
| [128\_toc\_37](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=128_toc_37) | Feedback |  |
| 129\_string\_1 | The Course cannot contact the LMS. Click 'OK' to continue and review the course. Note, Course Certification may not be available. Click 'Cancel' to exit |  |
| 130\_string\_2 |  |  |
| 131\_string\_3 | Questions |  |
| 132\_string\_4 | Question |  |
| 133\_string\_5 | not answered |  |
| 134\_string\_6 |  |  |
| 135\_string\_7 |  |  |
| 136\_string\_8 | Feedback: |  |
| 137\_string\_9 | Understanding Trade Sanctions |  |
| 138\_string\_10 |  |  |
| 139\_string\_11 |  |  |
| 140\_string\_12 | Retake Knowledge Check |  |
| 141\_string\_13 | COURSE DESCRIPTION: From time to time, the U.S. and other countries and jurisdictions restrict or prohibit trade dealings with certain countries, entities, and individuals. These restrictions may include bans on exports, imports, travel, investments, and other financial dealings with sanctioned parties. As employees of a U.S.-headquartered company with global business operations, we are required by law to comply with all U.S. trade sanctions programs and trade controls in every country in which we do business. This course provides an overview of U.S. sanctions programs and the types of activities covered by each of them. It also provides warning signs of potential violations and offers practical advice on how to comply with U.S. trade sanctions. |  |
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