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| ID | New English (Russian) | New English (Russian) | COMMENT |
| [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 parties subject to trade restrictions.  As a U.S.-headquartered company with global business operations, Abbott is required by law to comply with all U.S. trade restrictions programs and controls in every country in which we do business. | 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 parties subject to trade restrictions.  As a U.S.-headquartered company with global business operations, Abbott is required by law to comply with all U.S. trade restrictions 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. trade restrictions 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 restrictions.  This course should take approximately 25-30 minutes to complete. | This course provides an overview of U.S. trade restrictions 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 restrictions.  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 restrictions, * Explain why U.S. trade restrictions apply to Abbott, * Describe the three categories of trade restrictions 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 Abbott policies concerning U.S. trade restrictions. | Upon completion of this course, you will be able to:   * Define trade restrictions, * Explain why U.S. trade restrictions apply to Abbott, * Describe the three categories of trade restrictions 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 Abbott policies concerning U.S. trade restrictions. |  |
| [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. | 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. |  |
| [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. | 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. | 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 restrictions are and their purpose, * Why trade restrictions should matter to you, * Why U.S. trade restrictions apply in every country in which Abbott does business, * The types of trade restrictions you need to be aware of, and * The range of activities that may be prohibited. | In this section, you will learn:   * What trade restrictions are and their purpose, * Why trade restrictions should matter to you, * Why U.S. trade restrictions apply in every country in which Abbott does business, * The types of trade restrictions 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 Restrictions Defined  Trade restrictions, also known as economic restrictions, are restrictions in trading 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. | Trade Restrictions Defined  Trade restrictions, also known as economic restrictions, are restrictions in trading 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 R**estrictions**  Governments impose trade restrictions 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 restrictions make it more difficult or impossible for the country or individual bearing the trade restriction to trade with the country imposing it, they usually cause negative economic consequences for the targeted countries or individuals.  Trade restrictions are typically imposed to advance foreign policy or national security goals. For example, the U.S. and other countries impose restrictions on countries or individuals that sponsor terrorism, commit human rights violations on their people, or are known drug traffickers. | Purpose of Trade R**estrictions**  Governments impose trade restrictions 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 restrictions make it more difficult or impossible for the country or individual bearing the trade restriction to trade with the country imposing it, they usually cause negative economic consequences for the targeted countries or individuals.  Trade restrictions are typically imposed to advance foreign policy or national security goals. For example, the U.S. and other countries impose restrictions 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 trade restrictions, 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 is required by law to comply with all U.S. trade restrictions programs and trade controls in every country in which it operates. | Deliberately violating trade restrictions, 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 is required by law to comply with all U.S. trade restrictions programs and trade controls in every country in which it 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 applicable Abbott policies, including the Code of Business Conduct and Corporate Customs & Trade Compliance (CCTC) policies and procedures.  Click the Did You Know? button below to learn more. | Abbott is committed to conducting business according to the highest legal and ethical standards.  Because of this, all Abbott employees must comply with applicable Abbott policies, including 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 the Abbott Code of Business Conduct says about our adherence to all applicable trade restrictions:  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 regulations, 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 restrictions. For a full list of CCTC policies and procedures, please refer to the Resources section of this course. | DID YOU KNOW?  Here is what the Abbott Code of Business Conduct says about our adherence to all applicable trade restrictions:  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 regulations, 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 restrictions. 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. trade restrictions programs are referred to as “U.S. persons” and include:   * Companies incorporated in or based in the U.S. (including Puerto Rico), * 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. | U.S. Persons Defined  Those required to comply with U.S. trade restrictions programs are referred to as “U.S. persons” and include:   * Companies incorporated in or based in the U.S. (including Puerto Rico), * 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. |  |
| [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 restrictions against Cuba, while France does not.  Since Michelle is a French citizen working for a French subsidiary, and France has no trade restrictions against Cuba, would it be okay for Michelle to fill the order? | 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 restrictions against Cuba, while France does not.  Since Michelle is a French citizen working for a French subsidiary, and France has no trade restrictions 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 restrictions program.  [2] Yes. While the U.S. trade restriction 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. trade restrictions program.  Submit | [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 restrictions program.  [2] Yes. While the U.S. trade restriction 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. trade restrictions 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 trade restrictions program. Therefore, she may not fill the order. | 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 trade restrictions 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 R**estriction** Are the Focus of This Course  Besides U.S. trade restrictions programs, Abbott may also be subject to restrictions imposed under the local laws of the other countries in which we do business. In addition, the implementation of trade restrictions mandated by the United Nations or the European Union may also impose restrictive measures on Abbott.  Because U.S. restrictions apply in every country in which Abbott does business, and because U.S. restrictions are more comprehensive than those imposed by other countries, this course focuses specifically on U.S. trade restrictions programs and the types of activities covered by each program.  If you have questions about trade restrictions programs in other countries, please contact CCTC at [exports@abbott.com](mailto:exports@abbott.com). | U.S. Trade R**estriction** Are the Focus of This Course  Besides U.S. trade restrictions programs, Abbott may also be subject to restrictions imposed under the local laws of the other countries in which we do business. In addition, the implementation of trade restrictions mandated by the United Nations or the European Union may also impose restrictive measures on Abbott.  Because U.S. restrictions apply in every country in which Abbott does business, and because U.S. restrictions are more comprehensive than those imposed by other countries, this course focuses specifically on U.S. trade restrictions programs and the types of activities covered by each program.  If you have questions about trade restrictions 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 restrictions 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. | In the U.S., trade restrictions 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 restrictions programs fall into three (3) broad categories:   * Comprehensive restrictions, * Limited restrictions, and * List-based restrictions. | U.S. trade restrictions programs fall into three (3) broad categories:   * Comprehensive restrictions, * Limited restrictions, and * List-based restrictions. |  |
| [20\_C\_18](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=20_C_18) | Comprehensive R**estrictions**  Comprehensive restrictions prohibit nearly all activities with a restricted country or territory including their governments, residents, and entities organized in or operating from the country subjected to restrictions.  Comprehensive restrictions generally prohibit:   * Imports from the restricted country, * Exports or re-exports to the restricted country, and * Most business and financial dealings with or involving the restricted country or its government. | Comprehensive R**estrictions**  Comprehensive restrictions prohibit nearly all activities with a restricted country or territory including their governments, residents, and entities organized in or operating from the country subjected to restrictions.  Comprehensive restrictions generally prohibit:   * Imports from the restricted country, * Exports or re-exports to the restricted country, and * Most business and financial dealings with or involving the restricted country or its government. |  |
| [21\_C\_18](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=21_C_18) | Comprehensive country restrictions apply to a restricted country’s citizens and companies even if they are not directly connected to the government of that country. | Comprehensive country restrictions apply to a restricted 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 Restrictions, Continued  Restricted governments may also own or control companies that are outside their borders. Comprehensive country restrictions generally prohibit “U.S. persons” from engaging in activities with these companies, wherever they are located. | Comprehensive Restrictions, Continued  Restricted governments may also own or control companies that are outside their borders. Comprehensive country restrictions 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 restrictions include:   * Cuba, * Iran, * North Korea, * Syria, and * Other countries.   **For the full list of such countries you should contact CCTC at** [**exports@abbott.com**](mailto:exports@abbott.com)**. You should also contact CCTC** **i**f you plan to conduct business with any of these countries.  Some other countries are subject to limited or targeted restrictions rather than comprehensive restrictions. However, international events may cause the U.S. government to change a country’s status under its trade restrictions programs. This means some countries that are currently under limited restrictions could face more comprehensive restrictions in the future. | Countries that are currently subject to U.S. comprehensive restrictions include:   * Cuba, * Iran, * North Korea, * Syria, and * Other countries.   **For the full list of such countries you should contact CCTC at** [**exports@abbott.com**](mailto:exports@abbott.com)**. You should also contact CCTC** **i**f you plan to conduct business with any of these countries.  Some other countries are subject to limited or targeted restrictions rather than comprehensive restrictions. However, international events may cause the U.S. government to change a country’s status under its trade restrictions programs. This means some countries that are currently under limited restrictions could face more comprehensive restrictions in the future. |  |
| [24\_C\_21](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=24_C_21) | Limited R**estrictions**  Limited restrictions are confined to certain activities or specifically named targets. For example, limited restrictions 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. restrictions programs include:   * Sudan and * Venezuela.   As mentioned earlier, trade restrictions 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). | Limited R**estrictions**  Limited restrictions are confined to certain activities or specifically named targets. For example, limited restrictions 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. restrictions programs include:   * Sudan and * Venezuela.   As mentioned earlier, trade restrictions 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 Trade Restrictions  The majority of recent U.S. government trade restrictions are list-based restrictions 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. | List-based Trade Restrictions  The majority of recent U.S. government trade restrictions are list-based restrictions 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 Trade R**estrictions**, 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. | List-based Trade R**estrictions**, 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. | 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? | 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. | [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. | 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 trade restrictions programs.  Let’s take a look at the main activities covered by trade restrictions and discuss how they relate to Abbott’s business. | There are a number of activities that are prohibited or restricted by trade restrictions programs.  Let’s take a look at the main activities covered by trade restrictions 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 trade restrictions programs make it illegal to export goods, services, software, or technology to a restricted country or to trade with a denied party. Export bans prohibit not only direct exports to a restricted country, but also indirect exports or re-exports through a third, non-restricted country. | Exportation and Re-exportation  Many trade restrictions programs make it illegal to export goods, services, software, or technology to a restricted country or to trade with a denied party. Export bans prohibit not only direct exports to a restricted country, but also indirect exports or re-exports through a third, non-restricted 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 trade restrictions program, contact CCTC at [exports@abbott.com](mailto:exports@abbott.com) for approval. | 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 trade restrictions 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? | 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. trade restrictions.  [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. | [1] Yes, probably, as Abbott would be exporting directly to Ireland, and Ireland is not on the list of countries targeted by U.S. trade restrictions.  [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. restricted country. This is a violation of U.S. export bans that prohibit not only direct exports to a restricted country like Iran, but also indirect exports or re-exports through a third, non-restricted country, like Ireland, with the knowledge that they will be re-exported to Iran.  The trade restrictions cannot be avoided by trans-shipping goods through another country or selling via a distributor. | Even though Bruno is shipping the product to Ireland, he knows that the product will be re-exported to Iran – a U.S. restricted country. This is a violation of U.S. export bans that prohibit not only direct exports to a restricted country like Iran, but also indirect exports or re-exports through a third, non-restricted country, like Ireland, with the knowledge that they will be re-exported to Iran.  The trade restrictions 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 restrictions programs prohibit the importation of goods and services directly from restricted countries into the U.S., and more broadly prohibit any dealings, anywhere, related to products or services that originate from restricted countries. This includes return of exported products that entered the restricted country’s stream of commerce.  The prohibition extends to indirect imports of restricted country goods that travel through a non-restricted country.  The restriction also applies to goods made from raw materials or component parts from a restricted country. | Importation  Most trade restrictions programs prohibit the importation of goods and services directly from restricted countries into the U.S., and more broadly prohibit any dealings, anywhere, related to products or services that originate from restricted countries. This includes return of exported products that entered the restricted country’s stream of commerce.  The prohibition extends to indirect imports of restricted country goods that travel through a non-restricted country.  The restriction also applies to goods made from raw materials or component parts from a restricted 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 trade restrictions-related import controls, please contact CCTC at [exports@abbott.com](mailto:exports@abbott.com). | 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 trade restrictions-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 restricted countries.  However, some trade restrictions programs make it illegal to spend money or conduct certain activities in a restricted 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 restricted country. | Business Travel  U.S. citizens are legally permitted to travel to most restricted countries.  However, some trade restrictions programs make it illegal to spend money or conduct certain activities in a restricted 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 restricted 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 trade restrictions programs generally include a ban against facilitating activities by others. It is a violation of Abbott policy to assist a non-U.S. person or company in any transaction that is prohibited by Abbott policy.  For example, Abbott and its employees are prohibited from referring business with restricted countries to foreign companies or subsidiaries that are not subject to U.S. trade restrictions. | Facilitation of Activities by Others  Foreign trade controls and trade restrictions programs generally include a ban against facilitating activities by others. It is a violation of Abbott policy to assist a non-U.S. person or company in any transaction that is prohibited by Abbott policy.  For example, Abbott and its employees are prohibited from referring business with restricted countries to foreign companies or subsidiaries that are not subject to U.S. trade restrictions. |  |
| [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 restrictions.  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 trade restrictions 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? | 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 restrictions.  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 trade restrictions 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 with trade restrictions like Cuba, even if that third party is not covered by the U.S. ban on trade with Cuba. | [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 with trade restrictions 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 restrictions, as an employee of a U.S. company, she is not permitted to refer business with restricted countries to foreign companies who are not required to comply with U.S. trade restrictions. | Even though Gina intends to use a third party who is not subject to U.S. trade restrictions, as an employee of a U.S. company, she is not permitted to refer business with restricted countries to foreign companies who are not required to comply with U.S. trade restrictions. |  |
| [44\_C\_34](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=44_C_34) | Attempting to Circumvent Trade R**estrictions**  Similar to prohibiting the facilitation of activities, most trade restrictions programs make it illegal to help someone avoid the trade restrictions rules. For example, advising someone on how to structure a transaction so that it avoids or evades the trade restrictions is in itself a trade restriction violation.  However, giving a basic explanation of what the trade restrictions laws say is not a trade restrictions 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 restricted country without violating the trade restrictions 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 restricted countries. | Attempting to Circumvent Trade R**estrictions**  Similar to prohibiting the facilitation of activities, most trade restrictions programs make it illegal to help someone avoid the trade restrictions rules. For example, advising someone on how to structure a transaction so that it avoids or evades the trade restrictions is in itself a trade restriction violation.  However, giving a basic explanation of what the trade restrictions laws say is not a trade restrictions 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 restricted country without violating the trade restrictions 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 restricted countries. |  |
| [45\_C\_35](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=45_C_35) | As mentioned earlier, U.S. law requires Abbott to comply with U.S. trade restrictions regulations; and every Abbott employee must comply with Abbott policy to ensure that Abbott is not at risk of violating these 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 Abbott policy. | As mentioned earlier, U.S. law requires Abbott to comply with U.S. trade restrictions regulations; and every Abbott employee must comply with Abbott policy to ensure that Abbott is not at risk of violating these 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 Abbott policy. |  |
| [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. | 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 trade restrictions.  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). | Denied Party Screening System  Screening is critical for compliance with trade restrictions.  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. | 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 trade restrictions 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. | 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 trade restrictions 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 restrictions program or might indicate that a product is destined for an unintended end-use, end-user, or end destination. | During the normal course of your business, watch out for red flags that can warn you of a potential violation of a trade restrictions 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 restricted country (such as "Cuban Hospital" located in Qatar), this should be treated as a red flag that requires further investigation before proceeding. | 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 restricted 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. | 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 restricted 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. | Which of the following are red flags that should alert you that you may be dealing with a restricted 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 restricted country or person.  Click the forward arrow to continue. | 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 restricted 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. trade restrictions 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. | Violations of the U.S. trade restrictions 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 restrictions 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 TRADE RESTRICTIONS PROGRAMS. | As mentioned earlier, trade restrictions 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 TRADE RESTRICTIONS 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 trade restrictions programs. | 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 trade restrictions 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 trade restrictions violations. | Watch Out for Red Flags  Always watch out for red flags indicating potential trade restrictions 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. | 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. | 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 trade restrictions, raise them immediately with CCTC at [exports@abbott.com](mailto:exports@abbott.com). | Raise Questions and Concerns  If you have any questions or concerns about trade restrictions, 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 trade restrictions 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. | If you have any questions or would like to learn more about trade restrictions 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 trade restrictions, or if you have general questions about trade restrictions 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. | MANAGER OR SUPERVISOR  If you spot a red flag when dealing with a trade partner, have concerns related to attempts by anyone to circumvent trade restrictions, or if you have general questions about trade restrictions 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 trade restrictions 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 Restricted Countries * CCTC8990.11.001 – Export Control Classification Number Classifications | 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 trade restrictions 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 Restricted 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 restrictions programs. If you have any questions or would like to learn more about trade restrictions 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. | CORPORATE CUSTOMS & TRADE COMPLIANCE (CCTC)   * The CCTC is a corporate resource available to address your questions or concerns about trade restrictions programs. If you have any questions or would like to learn more about trade restrictions 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 restriction violations. | LEGAL DIVISION  Contact the Legal Division at +1-224-668-9161 with questions or concerns about legal implications of potential trade restriction 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. | 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. | 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. | 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 restrictions against Cuba. Is it okay for Julie to arrange this trip?  [1] Yes.  [2] No. | 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 restrictions 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 restrictions 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, Julie is required to comply with all Abbott policies concerning trade restrictions. | 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 restrictions 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, Julie is required to comply with all Abbott policies concerning trade restrictions. |  |
| [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? | 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 restricted country, like Iran, is considered facilitation of activities by others, and is prohibited. Even referring the business to the subsidiary likely violates the OFAC restrictions, 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 restrictions programs and controls in Spain and in every country in which Abbott does business. | James should not have referred the business to his colleague in Spain because:   * Using a subsidiary to have dealings with a restricted country, like Iran, is considered facilitation of activities by others, and is prohibited. Even referring the business to the subsidiary likely violates the OFAC restrictions, 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 restrictions 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 restrictions?  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. | Which of the following are considered U.S. persons who must comply with U.S. trade restrictions?  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 restrictions 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. | U.S. trade restrictions 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 restrictions?  [1] Exporting goods to France, knowing they will be re-exported to North Korea.  [2] Sending food and medicine to a restricted 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. | Which of the following actions by a U.S. company are likely to violate U.S. trade restrictions?  [1] Exporting goods to France, knowing they will be re-exported to North Korea.  [2] Sending food and medicine to a restricted 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 restrictions.   * A U.S. company cannot use a non-restricted country, like France, to re-export goods to a restricted county, like North Korea. * Exports of food and medicine to a restricted country for humanitarian reasons may be permitted, but only with appropriate licensing from OFAC or BIS. * U.S. trade restrictions prohibit selling to a company owned 50% or more by an SDN. * It is a violation of U.S. restrictions to sell equipment to a company that has an affiliation with a restricted country, like Iran. | All of these actions are likely to violate U.S. trade restrictions.   * A U.S. company cannot use a non-restricted country, like France, to re-export goods to a restricted county, like North Korea. * Exports of food and medicine to a restricted country for humanitarian reasons may be permitted, but only with appropriate licensing from OFAC or BIS. * U.S. trade restrictions prohibit selling to a company owned 50% or more by an SDN. * It is a violation of U.S. restrictions to sell equipment to a company that has an affiliation with a restricted 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 restrictions 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. | 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 restrictions 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-restricted country, like Turkey, with the intention of re-exporting them into a targeted country, like Iran, would be a violation of the U.S. trade restrictions 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. | Sending goods from the U.S. to a non-restricted country, like Turkey, with the intention of re-exporting them into a targeted country, like Iran, would be a violation of the U.S. trade restrictions 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 restrictions are always imposed against countries and not individuals or entities. | Trade restrictions 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 restrictions 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 restrictions against them are called list-based trade restrictions. | While trade restrictions 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 restrictions against them are called list-based trade restrictions. |  |
| [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. | 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. trade restrictions 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. | OFAC rules generally prohibit imports from Iran. Violations of U.S. trade restrictions 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? | 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 restrictions laws, even if your violations are unintended. | 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 restrictions 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 restrictions 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 restricted 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. | Which of the following should warn you that a transaction could potentially violate U.S. trade restrictions 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 restricted 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 restrictions laws. | All of these actions should raise red flags or warning signals as they all indicate potential violations of U.S. trade restrictions 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 trade restrictions programs?  [1] Human Resources (HR)  [2] Corporate Customs & Trade Compliance (CCTC)  [3] Public Affairs  [4] Legal Regulatory & Compliance (LR&C) | Who should you contact if you have any questions or would like to learn more about trade restrictions 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 restrictions 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 | If you have questions or would like to learn more about restrictions 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. | 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. | 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 | Introduction |  |
| [93\_toc\_2](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=93_toc_2) | Welcome | Welcome |  |
| [94\_toc\_3](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=94_toc_3) | Objectives | Objectives |  |
| [95\_toc\_4](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=95_toc_4) | Tutorial | Tutorial |  |
| [96\_toc\_5](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=96_toc_5) | The Basics of Trade Restrictions | The Basics of Trade Restrictions |  |
| [97\_toc\_6](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=97_toc_6) | Overview | Overview |  |
| [98\_toc\_7](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=98_toc_7) | What Trade Restrictions Are | What Trade Restrictions Are |  |
| [99\_toc\_8](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=99_toc_8) | Why Trade Restrictions Should Matter to You | Why Trade Restrictions 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 | 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 Restrictions Apply to Abbott | U.S. Trade Restrictions Apply to Abbott |  |
| [102\_toc\_11](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=102_toc_11) | Who Administers Trade Restrictions in the U.S. | Who Administers Trade Restrictions 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 Restrictions | Types of Trade Restrictions |  |
| [104\_toc\_13](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=104_toc_13) | Activities Covered Under Trade Restrictions | Activities Covered Under Trade Restrictions |  |
| [105\_toc\_14](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=105_toc_14) | Complying with Trade Restrictions | Complying with Trade Restrictions |  |
| [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 | Denied Party Screening |  |
| [108\_toc\_17](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=108_toc_17) | Red Flags | Red Flags |  |
| [109\_toc\_18](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=109_toc_18) | Consequences of Trade Restrictions Violations | Consequences of Trade Restrictions Violations |  |
| [110\_toc\_19](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=110_toc_19) | What to Do | 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 | 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 | Resources |  |
| [113\_toc\_22](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=113_toc_22) | Where to Get Help | Where to Get Help |  |
| [114\_toc\_23](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=114_toc_23) | Reference Material | 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 | Question 1 |  |
| [119\_toc\_28](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=119_toc_28) | Question 2 | Question 2 |  |
| [120\_toc\_29](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=120_toc_29) | Question 3 | Question 3 |  |
| [121\_toc\_30](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=121_toc_30) | Question 4 | Question 4 |  |
| [122\_toc\_31](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=122_toc_31) | Question 5 | Question 5 |  |
| [123\_toc\_32](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=123_toc_32) | Question 6 | Question 6 |  |
| [124\_toc\_33](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=124_toc_33) | Question 7 | Question 7 |  |
| [125\_toc\_34](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=125_toc_34) | Question 8 | Question 8 |  |
| [126\_toc\_35](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=126_toc_35) | Question 9 | Question 9 |  |
| [127\_toc\_36](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=127_toc_36) | Question 10 | Question 10 |  |
| [128\_toc\_37](http://www.learnex.co.uk/test/AbbottTradeSanctions/us/course/index.html?showScreen=128_toc_37) | Feedback | 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 | 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 | Questions |  |
| 132\_string\_4 | Question | Question |  |
| 133\_string\_5 | not answered | not answered |  |
| 134\_string\_6 |  |  |  |
| 135\_string\_7 |  |  |  |
| 136\_string\_8 | Feedback: | Feedback: |  |
| 137\_string\_9 | Understanding Trade Restrictions | Understanding Trade Restrictions |  |
| 138\_string\_10 |  |  |  |
| 139\_string\_11 |  |  |  |
| 140\_string\_12 | Retake Knowledge Check | 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 restricted parties. As a U.S.-headquartered company with global business operations, Abbott is required by law to comply with all U.S. trade restrictions programs and trade controls in every country in which we do business. This course provides an overview of U.S. trade restrictions 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 restrictions. | 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 restricted parties. As a U.S.-headquartered company with global business operations, Abbott is required by law to comply with all U.S. trade restrictions programs and trade controls in every country in which we do business. This course provides an overview of U.S. trade restrictions 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 restrictions. |  |
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