Abbott Understanding Trade Compliance

Translation Table 2024

**INSTRUCTIONS:**

**1)** Please edit the translation in the TARGET column directly.

**2)** To comment on a segment, simply create a new MS-Word comment.

**3)** It is best to edit this file in Normal or Draft view rather than page layout.

**4)** DO NOT alter the ID or SOURCE column text.

**5**) Blank rows should be ignored but not deleted.

**6**) **The following formatting must be maintained throughout:**

* **Paragraph (the number of paragraphs per row must be maintained)**
* **bold**
* **italic**
* **underline**
* **links**
* **lists (bullets and number of items in a list must be maintained)**

**7**) Ctrl+click on an ID in the left hand collumn to view the relevent screen in the online course. Toc ID’s will open the table of contents, ID’s containing \_string\_ have no relevent screen and are not linked.

|  |  |  |
| --- | --- | --- |
| ID | Source | Target |
| [Screen 0](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=1_C_1)  [1\_C\_1](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=1_C_1) | Understanding Trade Compliance  Click the forward arrow. |  |
| [Screen 1](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=2_C_2)  [2\_C\_2](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=2_C_2) | From time to time, the U.S. and other countries and jurisdictions (such as the European Union and United Kingdom) 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. |  |
| [Screen 2](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=3_C_3)  [3\_C\_3](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=3_C_3) | 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. |  |
| [Screen 3](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=4_C_4)  [4\_C\_4](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=4_C_4) | 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 Abbott policy violations and offers practical advice on how to comply with U.S. trade restrictions. |  |
| [Screen 4](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=5_C_5)  [5\_C\_5](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=5_C_5) | Upon completion of this course, you will understand:   * Trade restrictions and why they apply to Abbott. * Abbott’s expectations for compliance with U.S. trade restrictions and how to recognize warning signs of potential violations. * The importance of screening prospective third-party partners. * Where to go for help and support. |  |
| [Screen 5](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=6_C_6)  [6\_C\_6](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=6_C_6) | [1] Welcome  1 minute  [2] Introduction to Trade Compliance  5 minutes  [3] Laws and Regulations  4 minutes  [4] The Impact on Our Business  4 minutes  [5] Our Responsibilities  6 minutes  [6] Your Commitment  1 minute  [7] Knowledge Check  5 minutes  Learning Progress  This Topic is now available. |  |
| [Screen 6](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=7_C_7)  [7\_C\_7](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=7_C_7) | Trade restrictions are constraints on 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. |  |
| [Screen 7](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=8_C_8)  [8\_C\_8](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=8_C_8) | 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.  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. |  |
| [Screen 8](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=9_C_9)  [9\_C\_9](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=9_C_9) | Trade restrictions are typically imposed to advance foreign policy or national security goals.  For example, some countries impose restrictions on countries or individuals that sponsor terrorism, commit human rights violations on their people, or are known drug traffickers. |  |
| [Screen 9](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=10_C_10)  [10\_C\_10](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=10_C_10) | 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. |  |
| [Screen 10](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=11_C_11)  [11\_C\_11](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=11_C_11) | Abbott is committed to conducting business according to the highest legal and ethical standards.  This requirement is reflected in the Code of Business Conduct and Global Trade Compliance policies and procedures. |  |
| [Screen 11](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=12_C_12)  [12\_C\_12](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=12_C_12) | Here is what our Code of Business Conduct says about adherence to 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. |  |
| [Screen 12](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=13_C_13)  [13\_C\_13](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=13_C_13) | Our Global Trade Compliance policies and procedures provide detailed guidance on how to comply with trade restrictions.  For a full list of trade policies and procedures, please refer to the Resources section of this course. |  |
| [Screen 13](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=14_C_14)  [14\_C\_14](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=14_C_14) | 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. |  |
| [Screen 14](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=15_C_15)  [15\_C\_15](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=15_C_15) | 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. If you have questions about trade restrictions programs in other countries, please contact exports@abbott.com. |  |
| [Screen 15](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=16_C_16)  [16\_C\_16](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=16_C_16) | Quick Check  Test your knowledge now! |  |
| [Screen 15](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=17_C_16)  [17\_C\_16](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=17_C_16) | Michelle, an account manager at a small Colombian 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 Columbia does not. Since Michelle is a Colombian citizen working for a Colombian subsidiary, and Colombia has no trade restrictions against Cuba, would it be okay for Michelle to fill the order? |  |
| [Screen 15](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=18_C_16)  [18\_C\_16](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=18_C_16) | Yes. As a Colombian citizen living in Colombia, Michelle is not defined as a “U.S. person.” Therefore, she is not obligated to comply with the restrictions program.  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.  No. Even though Michelle is a Colombian citizen living in Colombia, she is working for a U.S. subsidiary and is therefore required to comply with the U.S. trade restrictions program.  Submit |  |
| [Screen 15](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=19_C_16)  [19\_C\_16](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=19_C_16) | 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. |  |
| [Screen 16](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=20_C_17)  [20\_C\_17](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=20_C_17) | Click the arrow to begin your review.  Review  Take a moment to review some of the key concepts in this section. |  |
| [Screen 16](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=21_C_17)  [21\_C\_17](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=21_C_17) | Overview of Trade Restrictions  Trade restrictions are constraints on trading imposed by the government of one or more countries on another country, organization, group, or individual. |  |
| [Screen 16](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=22_C_17)  [22\_C\_17](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=22_C_17) | Who Is Required to Comply with U.S Trade Restrictions  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., U.S. citizens or U.S. permanent residents, anyone who is in the U.S., and any foreign subsidiary of a U.S.-headquartered company or a U.S.-owned or-controlled entity. |  |
| [Screen 18](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=24_C_19)  [24\_C\_19](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=24_C_19) | 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. |  |
| [Screen 19](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=25_C_20)  [25\_C\_20](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=25_C_20) | U.S. trade restrictions programs fall into three (3) broad categories:   * Comprehensive restrictions, * Limited restrictions, and * List-based restrictions. |  |
| [Screen 20](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=26_C_21)  [26\_C\_21](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=26_C_21) | 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. |  |
| [Screen 21](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=27_C_22)  [27\_C\_22](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=27_C_22) | Comprehensive restrictions generally prohibit:   * Imports from the restricted country, * Exports or re-exports to the restricted country, and * Business negotiations or other financial dealings with or involving the restricted country or its government. |  |
| [Screen 22](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=28_C_23)  [28\_C\_23](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=28_C_23) | Did you know?  Comprehensive country restrictions prohibit most dealings with a restricted country’s citizens and companies even if they are not directly connected to the government of that country. |  |
| [Screen 23](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=29_C_24)  [29\_C\_24](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=29_C_24) | 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. |  |
| [Screen 24](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=30_C_25)  [30\_C\_25](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=30_C_25) | Countries that are currently subject to U.S. comprehensive restrictions include:   * Cuba, * Iran, * North Korea, * Syria, and * Certain other countries and territories.   If you plan to conduct business with any of these countries, you should first contact [exports@abbott.com](mailto:exports@abbott.com). |  |
| [Screen 25](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=31_C_26)  [31\_C\_26](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=31_C_26) | 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. |  |
| [Screen 26](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=32_C_27)  [32\_C\_27](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=32_C_27) | Limited restrictions are confined to certain activities or specifically named targets.  For example, limited restrictions might just restrict the import and export of products. Or, they might only target government officials involved in violent or terrorist acts. |  |
| [Screen 27](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=33_C_28)  [33\_C\_28](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=33_C_28) | Currently, the countries subject to such limited U.S. restrictions programs include, for instance:   * Venezuela, * Myanmar (Burma), * Afghanistan, and * Other countries.   As mentioned earlier, restrictions programs can change in response to international events. If you are unsure of the status of a particular country, contact exports@abbott.com. |  |
| [Screen 28](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=34_C_29)  [34\_C\_29](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=34_C_29) | 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 designated to an OFAC list of Specially Designated Nationals and Blocked Persons (“SDNs”). |  |
| [Screen 29](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=35_C_30)  [35\_C\_30](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=35_C_30) | 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 15,000 names of companies and individuals. The SDN list is dynamic and is updated constantly. |  |
| [Screen 30](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=36_C_31)  [36\_C\_31](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=36_C_31) | 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. |  |
| [Screen 31](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=37_C_32)  [37\_C\_32](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=37_C_32) | The Bureau of Industry and Security (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. |  |
| [Screen 32](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=38_C_33)  [38\_C\_33](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=38_C_33) | Quick Check  Test your knowledge now! |  |
| [Screen 32](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=39_C_33)  [39\_C\_33](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=39_C_33) | Mei, a sales manager at Abbott, is conducting restricted party screening on Zhejiang Medical Supply Company, a prospective new distributor in China. Although the company does not appear on any restricted party list, the customer profile states that the company is 75% owned by a board member who is on OFAC’s list of SDNs. Assuming Zhejiang Medical Supply Company does not appear on any restricted party list, would it be okay to do business with this company? |  |
| [Screen 32](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=40_C_33)  [40\_C\_33](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=40_C_33) | Yes, probably. Since the company itself does not appear on any restricted party list, it is ok to do business with it.  No, probably not. Even though the company is not on any restricted party list, it appears to be owned by an SDN.  Submit |  |
| [Screen 32](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=41_C_33)  [41\_C\_33](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=41_C_33) | That's correct!  That's not correct!  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. |  |
| [Screen 33](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=42_C_34)  [42\_C\_34](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=42_C_34) | Click the arrow to begin your review.  Review  Take a moment to review some of the key concepts in this section. |  |
| [Screen 33](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=43_C_34)  [43\_C\_34](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=43_C_34) | Comprehensive Restrictions  Comprehensive country restrictions prohibit most dealings with a restricted country’s citizens and companies even if they are not directly connected to the government of that country. |  |
| [Screen 33](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=44_C_34)  [44\_C\_34](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=44_C_34) | Limited Restrictions  Limited restrictions are confined to certain activities or specifically named targets. For example, limited restrictions might just restrict the import and export of products. Or, they might only target government officials involved in violent or terrorist acts. |  |
| [Screen 33](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=45_C_34)  [45\_C\_34](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=45_C_34) | List-based Restrictions  List-based restrictions target individuals or entities in certain countries. These individuals or entities are designated as 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. |  |
| [Screen 35](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=47_C_36)  [47\_C\_36](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=47_C_36) | 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. |  |
| [Screen 36](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=48_C_37)  [48\_C\_37](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=48_C_37) | 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. |  |
| [Screen 37](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=49_C_38)  [49\_C\_38](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=49_C_38) | 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 trade controls, contact exports@abbott.com for approval. |  |
| [Screen 38](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=50_C_39)  [50\_C\_39](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=50_C_39) | Quick Check  Test your knowledge now! |  |
| [Screen 38](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=51_C_39)  [51\_C\_39](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=51_C_39) | Bruno, an Abbott sales rep, is attending a trade show in the U.S. He is approached by Ashley, who works for 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? |  |
| [Screen 38](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=52_C_39)  [52\_C\_39](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=52_C_39) | 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.  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.  Submit |  |
| [Screen 38](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=53_C_39)  [53\_C\_39](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=53_C_39) | That's correct!  That's not correct!  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. Absent U.S. Government authorization, 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. |  |
| [Screen 39](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=54_C_40)  [54\_C\_40](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=54_C_40) | 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. |  |
| [Screen 40](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=55_C_41)  [55\_C\_41](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=55_C_41) | 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. This means that a member of the Procurement team purchasing goods for Abbott must ensure that no products or components, in whole or in part, are knowingly sourced from any sanctioned person or country, no matter how far down the supply chain. |  |
| [Screen 41](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=56_C_42)  [56\_C\_42](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=56_C_42) | Did you know?  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. We should also educate Abbott suppliers on our expectations that they follow applicable trade controls. If you have any questions regarding restrictions-related import controls, please contact exports@abbott.com. |  |
| [Screen 42](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=57_C_43)  [57\_C\_43](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=57_C_43) | 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 in Iran, for example, are still prohibited. |  |
| [Screen 43](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=58_C_44)  [58\_C\_44](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=58_C_44) | So, as an Abbott employee located anywhere in the world, you must consult with Global Trade Compliance at exports@abbott.com before you travel on business to any country under restrictions. |  |
| [Screen 44](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=59_C_45)  [59\_C\_45](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=59_C_45) | 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. |  |
| [Screen 45](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=60_C_46)  [60\_C\_46](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=60_C_46) | Quick Check  Test your knowledge now! |  |
| [Screen 45](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=61_C_46)  [61\_C\_46](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=61_C_46) | Gina works 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 agrees to refer business to Sergio’s company. Would it be okay? |  |
| [Screen 45](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=62_C_46)  [62\_C\_46](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=62_C_46) | 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.  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.  Submit |  |
| [Screen 45](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=63_C_46)  [63\_C\_46](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=63_C_46) | That's correct!  That's not correct!  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. |  |
| [Screen 46](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=64_C_47)  [64\_C\_47](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=64_C_47) | 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. |  |
| [Screen 47](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=65_C_48)  [65\_C\_48](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=65_C_48) | The only legal way to do business with a country under restrictions without violating the restrictions program 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 exports@abbott.com for any activity involving countries under restrictions. |  |
| [Screen 48](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=66_C_49)  [66\_C\_49](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=66_C_49) | Click the arrow to begin your review.  Review  Take a moment to review some of the key concepts in this section. |  |
| [Screen 48](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=67_C_49)  [67\_C\_49](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=67_C_49) | Exportation and Re-exportation  Export bans prohibit not only direct exports to a restricted country, but also indirect exports or re-exports through a third, non-restricted country. |  |
| [Screen 48](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=68_C_49)  [68\_C\_49](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=68_C_49) | Importation  Most trade restrictions programs prohibit the importation of goods and services directly from restricted countries into the U.S. The prohibition extends to indirect imports of restricted country goods that travel through a non-restricted country. |  |
| [Screen 48](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=69_C_49)  [69\_C\_49](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=69_C_49) | 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. Consult with Global Trade Compliance at exports@abbott.com before you travel on business to any country under restrictions. |  |
| [Screen 48](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=70_C_49)  [70\_C\_49](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=70_C_49) | 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. |  |
| [Screen 48](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=71_C_49)  [71\_C\_49](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=71_C_49) | Trying to Circumvent Trade Restrictions  It illegal to help someone avoid trade restrictions rules. |  |
| [Screen 50](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=73_C_51)  [73\_C\_51](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=73_C_51) | 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, healthcare professionals, principal investigators, speakers, recipients of donations, etc. against all applicable and relevant restricted party lists. |  |
| [Screen 51](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=74_C_52)  [74\_C\_52](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=74_C_52) | 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. |  |
| [Screen 52](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=75_C_53)  [75\_C\_53](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=75_C_53) | Screening is critical for compliance with trade restrictions.  To help you conduct screening, Abbott’s Global Trade Compliance 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. |  |
| [Screen 53](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=76_C_54)  [76\_C\_54](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=76_C_54) | Did you know?  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. |  |
| [Screen 54](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=77_C_55)  [77\_C\_55](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=77_C_55) | 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\_DPS@abbott.com for further due diligence. |  |
| [Screen 55](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=78_C_56)  [78\_C\_56](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=78_C_56) | 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, review the Denied Party Screening page on Abbott World. |  |
| [Screen 56](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=79_C_57)  [79\_C\_57](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=79_C_57) | During the normal course of your business, watch out for red flags that can warn you of a potential violation of Abbott’s trade compliance policies or might indicate that a product is destined for an unintended end-use, end-user, or end destination. |  |
| [Screen 57](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=80_C_58)  [80\_C\_58](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=80_C_58) | 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. |  |
| [Screen 58](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=81_C_59)  [81\_C\_59](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=81_C_59) | 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. |  |
| [Screen 59](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=82_C_60)  [82\_C\_60](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=82_C_60) | 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 exports@abbott.com for further instructions. |  |
| [Screen 60](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=83_C_61)  [83\_C\_61](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=83_C_61) | Quick Check  Test your knowledge now! |  |
| [Screen 60](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=84_C_61)  [84\_C\_61](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=84_C_61) | Which of the following are red flags that should alert you that you may be dealing with a restricted country or person?  Check all that apply. |  |
| [Screen 60](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=85_C_61)  [85\_C\_61](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=85_C_61) | 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 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.  Submit |  |
| [Screen 60](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=86_C_61)  [86\_C\_61](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=86_C_61) | That's correct!  That's not correct!  These are all examples of red flags that should alert you that you may be dealing with a restricted country or person. |  |
| [Screen 61](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=87_C_62)  [87\_C\_62](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=87_C_62) | There are serious consequences of noncompliance with Abbott trade compliance policies.  If you are aware of any potential violations, immediately contact Global Trade Compliance at +1-224-668-9585, or Legal Regulatory & Compliance at +1-224-668-5635. |  |
| [Screen 62](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=88_C_63)  [88\_C\_63](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=88_C_63) | Trade restrictions programs are complicated and can change in response to international events.  CLICK FORWARD TO LEARN WHAT YOU CAN DO TO FULLY COMPLY WITH ALL U.S. FOREIGN TRADE CONTROLS AND TRADE RESTRICTIONS PROGRAMS. |  |
| [Screen 62](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=89_C_63)  [89\_C\_63](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=89_C_63) | 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. |  |
| [Screen 62](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=90_C_63)  [90\_C\_63](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=90_C_63) | Watch Out for Red Flags  Always watch out for red flags indicating potential noncompliance with Abbott’s trade compliance policies and procedures. |  |
| [Screen 62](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=91_C_63)  [91\_C\_63](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=91_C_63) | Stop the Transaction  If you spot a red flag, immediately stop the transaction and contact exports@abbott.com for guidance. |  |
| [Screen 62](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=92_C_63)  [92\_C\_63](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=92_C_63) | Screen Trade Partners  Always screen prospective trade partners, customers, vendors, healthcare professionals, etc. against all applicable and relevant restricted party lists, and ensure that existing partners are screened on an ongoing basis. |  |
| [Screen 62](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=93_C_63)  [93\_C\_63](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=93_C_63) | Raise Questions and Concerns  If you have any questions or concerns about restrictions, raise them immediately to exports@abbott.com. |  |
| [Screen 63](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=94_C_64)  [94\_C\_64](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=94_C_64) | Click the arrow to begin your review.  Review  Take a moment to review some of the key concepts in this section. |  |
| [Screen 63](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=95_C_64)  [95\_C\_64](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=95_C_64) | Screening Trade Partners  All Abbott affiliates globally must screen their prospective trade partners, customers, vendors, banks, healthcare professionals, principal investigators, speakers, recipients of donations, etc. against all applicable and relevant restricted party lists. |  |
| [Screen 63](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=96_C_64)  [96\_C\_64](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=96_C_64) | Abbott’s Denied Party Screening System  Abbott’s Global Trade Compliance department has implemented a system that makes screening easy and efficient. To obtain access to the system and instructions on how to use it, please contact CCTC\_DPS@abbott.com. |  |
| [Screen 63](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=97_C_64)  [97\_C\_64](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=97_C_64) | If an Entity Appears on Restricted Party List  If screening reveals that a name or an entity appears on a restricted party list as an exact match, you should immediately suspend transactions involving the person or entity listed and contact CCTC\_DPS@abbott.com for further due diligence. |  |
| [Screen 63](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=98_C_64)  [98\_C\_64](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=98_C_64) | Red Flags  During the normal course of your business, watch out for red flags that can warn you of a potential violation of Abbott’s trade compliance policies or might indicate that a product is destined for an unintended end-use, end-user, or end destination. |  |
| [Screen 63](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=99_C_64)  [99\_C\_64](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=99_C_64) | Questions and Concerns  If you have any questions or concerns about restrictions, raise them immediately to exports@abbott.com. |  |
| [Screen 65](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=101_C_66)  [101\_C\_66](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=101_C_66) | Take a moment to confirm that you understand your responsibilities related to trade restrictions.  I confirm that I understand my responsibilities regarding trade restrictions and know where to locate and review the applicable policies and procedures  Confirm |  |
| [Screen 66](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=102_C_67)  [102\_C\_67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=102_C_67) | 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. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=103_C_68)  [103\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=103_C_68) | [1] 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? |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=104_C_68)  [104\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=104_C_68) | [1] Yes. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=105_C_68)  [105\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=105_C_68) | [2] No.  Next |  |
| Screen 67  Question 1: Feedback  106\_C\_68 | 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. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=107_C_68)  [107\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=107_C_68) | [2] 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? |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=108_C_68)  [108\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=108_C_68) | [1] Yes. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=109_C_68)  [109\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=109_C_68) | [2] No.  Next |  |
| Screen 67  Question 2: Feedback  110\_C\_68 | 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. * 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. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=111_C_68)  [111\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=111_C_68) | [3] Which of the following are considered U.S. persons who must comply with U.S. trade restrictions?  Check all that apply. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=112_C_68)  [112\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=112_C_68) | [1] A U.S. citizen who resides permanently in Israel. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=113_C_68)  [113\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=113_C_68) | [2] The Paris affiliate of a U.S. company. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=114_C_68)  [114\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=114_C_68) | [3] A Mexican company located in Juarez that sells primarily to the U.S. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=115_C_68)  [115\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=115_C_68) | [4] A Danish citizen visiting the U.S. while on vacation.  Next |  |
| Screen 67  Question 3: Feedback  116\_C\_68 | 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. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=117_C_68)  [117\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=117_C_68) | [4] Which of the following actions by a U.S. company are likely to violate U.S. trade restrictions?  Check all that apply. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=118_C_68)  [118\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=118_C_68) | [1] Exporting goods to France, knowing they will be re-exported to North Korea. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=119_C_68)  [119\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=119_C_68) | [2] Sending food and medicine to a restricted country without OFAC licensing. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=120_C_68)  [120\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=120_C_68) | [3] Selling to a company owned by an SDN. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=121_C_68)  [121\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=121_C_68) | [4] Selling equipment to a research institute affiliated with the government of Iran.  Next |  |
| Screen 67  Question 4: Feedback  122\_C\_68 | 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. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=123_C_68)  [123\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=123_C_68) | [5] 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? |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=124_C_68)  [124\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=124_C_68) | [1] Abbott may sell the devices to Istanbul Distributors because Turkey does not impose economic restrictions on Iran. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=125_C_68)  [125\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=125_C_68) | [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. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=126_C_68)  [126\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=126_C_68) | [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.  Next |  |
| Screen 67  Question 5: Feedback  127\_C\_68 | 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. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=128_C_68)  [128\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=128_C_68) | [6] Trade restrictions are always imposed against countries and not individuals or entities. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=129_C_68)  [129\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=129_C_68) | [1] True. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=130_C_68)  [130\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=130_C_68) | [2] False.  Next |  |
| Screen 67  Question 6: Feedback  131\_C\_68 | 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. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=132_C_68)  [132\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=132_C_68) | [7] May a U.S.-based company import refurbished medical equipment marked "Made in Iran” from Europe-based Iranian doctors? |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=133_C_68)  [133\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=133_C_68) | [1] Yes. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=134_C_68)  [134\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=134_C_68) | [2] No.  Next |  |
| Screen 67  Question 7: Feedback  135\_C\_68 | OFAC rules generally prohibit imports from Iran. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=136_C_68)  [136\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=136_C_68) | [8] 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? |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=137_C_68)  [137\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=137_C_68) | [1] Yes. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=138_C_68)  [138\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=138_C_68) | [2] No.  Next |  |
| Screen 67  Question 8: Feedback  139\_C\_68 | 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. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=140_C_68)  [140\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=140_C_68) | [9] Which of the following should warn you that a transaction could potentially violate U.S. trade restrictions laws? |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=141_C_68)  [141\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=141_C_68) | [1] A customer requests an order to be delivered to an unusual location. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=142_C_68)  [142\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=142_C_68) | [2] A customer insists on paying cash for an expensive item that would normally be paid for in installments. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=143_C_68)  [143\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=143_C_68) | [3] The name of the company you are dealing with indicates possible ties with a restricted country. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=144_C_68)  [144\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=144_C_68) | [4] A product's technical specifications do not fit the technical specifications of products typically found in the country it is being shipped to. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=145_C_68)  [145\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=145_C_68) | [5] All of the above.  Next |  |
| Screen 67  Question 9: Feedback  146\_C\_68 | All of these actions should raise red flags or warning signals as they all indicate potential violations of U.S. trade restrictions laws. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=147_C_68)  [147\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=147_C_68) | [10] Who should you contact if you have any questions or would like to learn more about trade restrictions programs?  Check all that apply. |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=148_C_68)  [148\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=148_C_68) | [1] Human Resources (HR) |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=149_C_68)  [149\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=149_C_68) | [2] Global Trade Compliance (GTC) |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=150_C_68)  [150\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=150_C_68) | [3] Public Affairs |  |
| [Screen 67](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=151_C_68)  [151\_C\_68](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=151_C_68) | [4] Legal Regulatory & Compliance (LR&C)  Submit |  |
| Screen 67  Question 10: Feedback  152\_C\_68 | If you have questions or would like to learn more about restrictions programs, please contact Global Trade Compliance (GTC) and Legal Regulatory & Compliance (LR&C) at exports@abbott.com. |  |
| [Screen 69](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=157_C_199)  [157\_C\_199](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=157_C_199) | [3] As a result of this session, I have a better understanding of trade restrictions.  Strongly Disagree  Disagree  Neutral  Agree  Strongly Agree |  |
| [Screen 70](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=160_C_200)  [160\_C\_200](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=160_C_200) | Where to Get Help |  |
| [Screen 70](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=161_C_200)  [161\_C\_200](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=161_C_200) | 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. |  |
| [Screen 70](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=162_C_200)  [162\_C\_200](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=162_C_200) | 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 restrictions programs. Click [here](https://abbott.sharepoint.com/sites/AW-GlobalTradeCompliance/SitePages/Policies-and-Procedures.aspx) to access the documents on Abbott World. * 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 |  |
| [Screen 70](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=163_C_200)  [163\_C\_200](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=163_C_200) | Global Trade Compliance  Global Trade Compliance 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 restrictions programs, please contact:   * Phone: +1-224-668-9585 * Email: [exports@abbott.com](mailto:exports@abbott.com) * Website: [Customs & Trade Compliance](https://abbott.sharepoint.com/sites/abbottworld/Customs_TradeCompliance/Pages/Home.aspx)   Denied Party Screening details can be reviewed on Abbott World by clicking [here](https://abbott.sharepoint.com/sites/AW-GlobalTradeCompliance/SitePages/DeniedPartyScreening.aspx).  If you have any concerns about a potential violation, immediately contact Global Trade Compliance at +1-224-668-9585 or Legal Regulatory & Compliance at +1-224-668-5635. |  |
| [Screen 70](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=164_C_200)  [164\_C\_200](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=164_C_200) | Legal Division  Contact the Legal Division at +1-224-668-5635 with questions or concerns about legal implications of potential trade sanctions violations. |  |
| [Screen 70](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=165_C_200)  [165\_C\_200](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=165_C_200) | Office of Ethics and Compliance (OEC)  The OEC is a corporate resource available to address your compliance questions or concerns, including questions concerning trade restrictions.   * Visit the [Contact OEC](https://icomply.abbott.com/Apps/ComplianceContacts/) page on the [OEC website](https://abbott.sharepoint.com/sites/AW-Ethics_Compliance) on Abbott World. * Visit [Speak Up](http://speakup.abbott.com/) to voice your concerns about potential violations of our Code of Business Conduct or policies. [Speak Up](http://speakup.abbott.com/) is available globally, 24/7 in multiple languages. * You can also email [investigations@abbott.com](mailto:investigations@abbott.com). |  |
| [Screen 70](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=166_C_200)  [166\_C\_200](http://www.learnex.co.uk/test/AbbottUTCompliance/courses/EN-US/course/index.html?showScreen=166_C_200) | Course Resources  Transcript  Click [here](file:///C:\dev\AbbottUTCompliance\courses\EN-US\translation\reference\Transcript.pdf) for a full transcript of the course |  |
| 167\_toc\_1 | Welcome |  |
| 168\_toc\_2 | Understanding Trade Compliance |  |
| 169\_toc\_3 | Our Philosophy |  |
| 170\_toc\_4 | Objectives |  |
| 171\_toc\_5 | Table of Contents |  |
| 172\_toc\_6 | Introduction to Trade Compliance |  |
| 173\_toc\_7 | Overview of Trade Restrictions |  |
| 174\_toc\_8 | Purpose of Trade Restrictions |  |
| 175\_toc\_9 | Compliance with Trade Restrictions |  |
| 176\_toc\_10 | Abbott’s Commitment |  |
| 177\_toc\_11 | U.S. Persons Defined |  |
| 178\_toc\_12 | Other Trade Restrictions Programs |  |
| 179\_toc\_13 | Quick Check |  |
| 180\_toc\_14 | Review |  |
| 181\_toc\_15 | Table of Contents |  |
| 182\_toc\_16 | Laws and Regulations |  |
| 183\_toc\_17 | Introduction |  |
| 184\_toc\_18 | Comprehensive Restrictions |  |
| 185\_toc\_19 | Limited Restrictions |  |
| 186\_toc\_20 | List-based Restrictions |  |
| 187\_toc\_21 | Quick Check |  |
| 188\_toc\_22 | Review |  |
| 189\_toc\_23 | Table of Contents |  |
| 190\_toc\_24 | The Impact on Our Business |  |
| 191\_toc\_25 | Introduction |  |
| 192\_toc\_26 | Exportation and Re-exportation |  |
| 193\_toc\_27 | Quick Check |  |
| 194\_toc\_28 | Importation |  |
| 195\_toc\_29 | Business Travel |  |
| 196\_toc\_30 | Facilitation of Activities by Others |  |
| 197\_toc\_31 | Quick Check |  |
| 198\_toc\_32 | Trying to Circumvent Trade Restrictions |  |
| 199\_toc\_33 | Review |  |
| 200\_toc\_34 | Table of Contents |  |
| 201\_toc\_35 | Our Responsibilities |  |
| 202\_toc\_36 | Importance of Screening Trade Partners |  |
| 203\_toc\_37 | Denied Party Screening System |  |
| 204\_toc\_38 | What to Do If You Find a Name on a Restricted Party List |  |
| 205\_toc\_39 | Red Flags |  |
| 206\_toc\_40 | Quick Check |  |
| 207\_toc\_41 | Consequences of Noncompliance with Trade Compliance Policies |  |
| 208\_toc\_42 | What to Do |  |
| 209\_toc\_43 | Review |  |
| 210\_toc\_44 | Table of Contents |  |
| 211\_toc\_45 | Your Commitment |  |
| 212\_toc\_46 | Your Commitment |  |
| 213\_toc\_47 | Knowledge Check |  |
| 214\_toc\_48 | Introduction |  |
| 215\_toc\_49 | Assessment |  |
| 216\_toc\_50 | Feedback |  |
| 217\_toc\_51 | Survey |  |
| 218\_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 |  |
| 219\_string\_2 | All questions remain unanswered |  |
| 220\_string\_3 | Questions |  |
| 221\_string\_4 | Question |  |
| 222\_string\_5 | not answered |  |
| 223\_string\_6 | That's correct! |  |
| 224\_string\_7 | That's not correct! |  |
| 225\_string\_8 | Feedback: |  |
| 226\_string\_9 | Understanding Trade Compliance |  |
| 227\_string\_10 | Knowledge Check |  |
| 228\_string\_11 | Submit |  |
| 229\_string\_12 | Retake |  |
| 230\_string\_13 | Course Description: As a healthcare company, it is critical that we always do what is right for the many people we serve. This includes complying with all applicable laws and regulations. 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 and offers practical advice on how to comply with Abbott policies.​​​​​​​​ This course will take approximately 30 minutes to complete. |  |
| 231\_string\_14 | Menu |  |
| 232\_string\_15 | Resources |  |
| 233\_string\_16 | Reference Material |  |
| 234\_string\_17 | Audio |  |
| 235\_string\_18 | Exit |  |
| 236\_string\_19 | Close |  |
| 237\_string\_20 | Comment... |  |