

Expectations



As a Dell Technologies Partner, you are expected to always comply with U.S. export laws and sanctions regulations wherever you are located in the world. This includes not providing any products, software or services to any prohibited countries, people, entities or for prohibited end-uses. And as our Partner, you should engage with customers in a manner of integrity and help identify any red flags or potential restricted circumstances.

Prohibited Countries



Dell Technologies products or services CAN NOT be sold directly or indirectly through a third party to prohibited countries or a prohibited country's Embassy or Consulate, regardless of its location, without a U.S. government license or other similar authorization. The prohibited locations are **Cuba, Iran, North Korea, Syria and Crimea region**. Many other countries, including **China, Russia, Sudan and Venezuela** are treated as **high risk** due to heightened restrictions with entities in those locations.

Prohibited People and Entities



Dell Technologies products or services CAN NOT be sold directly or indirectly through a third party to certain people or entities as identified by the [U.S. Bureau of Industry and Security \(BIS\)](#) and [Office of Foreign Assets Controls \(OFAC\)](#). This includes Specially Designated Nationals and Blocked Persons (SDN List), terrorists, criminal organizations and drug traffickers.

Prohibited End-Uses



A license authorization from the U.S. Government may need to be obtained if the product's end-use falls into any one of the following restricted categories:

- Nuclear Technology
- Chemical or Biological Weapons
- Certain activities related to oil and gas exploration and production
- Maritime Nuclear Propulsion
- Missile Technology, including space exploration activities and unmanned aerial vehicle (UAV or drone) activities
- Military End Users or End Uses
- Weapons of Mass Destruction

Red Flags



A red flag is any circumstance in a transaction that indicates the sale or export may be destined for a restricted end-use, end-user, or to a restricted destination. There are 4 indicators that could result in a red flag.

Place



- Companies headquartered in a prohibited country or branches located abroad in a non-prohibited country
- Delivery dates are vague, shipping routes are circuitous, final destination is a traditional transshipment point
- Customer uses a PO Box or UPS Store as their delivery address
- A freight forwarder is listed as the product's final destination or customer has indicated they will use a freight forwarder

Purpose



- An export license issued by U.S. Government may be required for sales to individuals or entities buying products or services for any of the prohibited end-uses
- The customer or purchasing agent is reluctant to offer information about the end-use of the item
- The product's capabilities do not fit the buyer's line of business
- The customer is unfamiliar with the product's performance characteristics but still wants the product
- The customer is a freight forwarder or general trading company located in a traditional transshipment point

Product



- Some of Dell's products require export or import licenses. They include products with advanced encryption capabilities or products specially designed or modified for aerospace/defense end-use.
- The item ordered is incompatible with the technical level of the country to which it is being shipped, such as semiconductor manufacturing equipment being shipped to a country that has no electronics industry

People



- Any involvement with a person on a government denied party list, or a person in a prohibited country (e.g. Iran), or a prohibited country bank
- Customer or company name contains wording of a prohibited country within the name (e.g., Syrian Airlines)
- Person looking to use a Government bank of a prohibited country (e.g. Bank of Saderat's Paris branch office)
- Customer is willing to pay cash for a very expensive item when the terms of sale would normally call for financing
- Customer asks to omit or change information from invoices
- Customer requests anonymity or is unwilling to provide documents to verify identity
- Routine installation, training, or maintenance services are declined by the customer

Additional Resources



- Bureau of Industry and Security (BIS) [website](#)
- BIS "Know Your Customer" [guide](#)
- BIS Online Training [website](#)
- Office of Foreign Assets Control (OFAC) [website](#)
- OFAC "Sanctions Programs and Country Information" [guide](#)