



Policy on Compliance with the U.S. Economic Sanctions Programs The American University of Beirut Mediterraneo

The American University of Beirut Mediterraneo (“AUB Mediterraneo” or the “University”) is committed to the principle of equal opportunity in education and employment, and in the administration of its educational, admissions, and employment policies, and other university programs and activities. AUB Mediterraneo does not discriminate on the basis of race, color, religion, age, national or ethnic identity, gender or gender identity, marital status, disability, genetic predisposition or carrier status, alienage or citizenship status, political affiliation, or any legally protected characteristic. As a U.S. educational institution, AUB Mediterraneo also recognizes that it must comply with all applicable laws of the United States as well as the laws of Cyprus, the country in which it operates.

AUB Mediterraneo shall take all appropriate steps to comply with U.S. economic sanctions programs, including by:

1. Providing regular training to its relevant administrative and academic staff on compliance with applicable U.S. economic sanctions programs. The relevant administrative and academic staff to whom such training shall be provided will include the provost (rector), relevant deans and any others responsible for confirming the information set forth in the next three bullets below.
2. Confirming that the following individuals and entities are not included on the Specially Designated Nationals List (“SDN List”) maintained by the U.S. Office of Foreign Assets Control (“OFAC”), in advance of hiring, engagement, invitation to the University, or contract execution, as applicable: (i) faculty and staff, (ii) contractors, vendors and suppliers, and (iii) unenrolled individuals or entities invited to AUB Mediterraneo to receive training or expert advice or assistance. For purpose of this Policy on Compliance with U.S. Economic Sanctions Programs, the term “training” means instruction or teaching designed to impart a specific skill or skills, as opposed to general knowledge (including for purposes of discussion of policy), and the phrase “expert advice or assistance” means advice or assistance derived from scientific, technical or other specialized knowledge.
3. Not allowing any individual to receive training or expert advice or assistance at AUB Mediterraneo to the extent that AUB Mediterraneo is on notice that the individual is receiving the training or expert advice or assistance in his or her capacity as a member or representative of an entity included on OFAC’s SDN List.
4. Not allowing any entity that is included on OFAC’s SDN List to be included in AUB Mediterraneo’s Non-Governmental Organization (“NGO”) database or any other database or tool maintained by or within the control of AUB Mediterraneo, whose purpose, function or known effect is to put individuals in touch with NGOs or other entities.
5. Engaging an external auditor to audit AUB Mediterraneo’s compliance with its policies and procedures designed to ensure its observance of U.S. economic sanctions laws and regulations, including the procedures described in this Policy on Compliance with U.S.



Economic Sanctions Programs. Such audits shall be conducted on a regular basis, and not less than annually. AUB Mediterraneo shall supplement the external audits with an audit by AUB Mediterraneo's internal auditor at least one time annually. AUB Mediterraneo shall take appropriate steps to address any issues that may arise from such audits.

6. Periodically reviewing and updating the University's policies and procedures relating to student, faculty and staff recruiting and employment, purchasing and procurement, grants and contracts, educational programming, and other University policies and procedures as appropriate, to reflect the foregoing.