Export restrictions and sanctions

Effective as of June 24 2025, replaces the previous version of Export restrictions and sanctions.

The content of this document is a mandatory part of the <u>General Terms of Use for CSC's Services for Research</u>.

Export restrictions apply to <u>CSC's Services for Research</u>. For example, CSC's supercomputing hardware, the services produced by the hardware is considered so-called dual-use item. Also the research results provided by the supercomputing services and expertise derived from them can be dual-use items. Dual-use items are regulated by a mandatory legislation. The users must obey Finnish and EU export restrictions and sanctions.

The services must not be used against US export restrictions or sanctions since these are included as contract terms in contracts with US vendors, other subcontractors and software providers and in that way they bind CSC and also restrict service use.

Software-specific license terms can be found from <u>CSC guidelines and user manuals.</u> CSC's Service Desk will be happy to answer your questions.

When using CSC services, creating a CSC Project, adding members to your CSC Project or applying resources for a CSC Project you affirm and confirm the following:

- Your use of CSC's Services for Research or the results thereof do not violate export control regulations or sanctions.
- You are not on any sanctions list. The project manager of the CSC Project must ensure that no project member is on a sanctions list.
- You do not have any commitments that would violate export control or sanctions legislation. You are not affiliated with organizations operating in countries subject to sanctions. You do not use CSC's Services for Research in countries subject to sanctions.
- You do not transfer content, for example software, computing results and research data, or competences to countries under the export restrictions or sanctions.
- You follow the possible export restrictions by the software vendor of the software you are using.
- You do not circumvent the above-mentioned prohibitions by technical means.

If you are uncertain whether export restrictions or sanctions apply to your research project, we recommend to contact the Finnish home organization of your project or CSC Service Desk.

CSC is responsible for inspection, monitoring and security processes related to the use of services and export restrictions. Service users and CSC staff are obliged to notify CSC of any illegal research or other unwanted act that may breach the contract, export or sanctions regulations or other commitments.

If CSC has reasons to suspect that the services are used partially or entirely against export restrictions or sanctions, CSC is obliged to report the issue to the export control unit of the Ministry for Foreign Affairs according to the Finnish law on export control 500/2024. If a crime or violation is suspected, CSC is obliged to make a report of an offence to the police. In addition CSC may inform the CSC Project Manager and the relevant home organizations about possible violations of these rules.

Information on export regulations and sanctions:

- Finnish law on dual-use items export control (Laki kaksikäyttötuotteiden vientivalvonnasta, in Finnish)
- Regulation (EU) 2021/821 of the European Parliament and of the Council for the control of exports, brokering, technical assistance, transit and transfer of dual-use items (recast), especially the Annex 1
- Sanctions by countries (Ministry for Foreign Affairs, in Finnish), Export Control (Ministry for Foreign Affairs, in English) In particular, sanctions against Russia (Ukraine) are the most important consolidated versions of Council Regulation (EU) 833/2014 and (EU) 269/2014.
- EU sanctions map on dual-use items
- <u>Information on US export regulations and sanctions</u>
- <u>US Resources on Export Controls Implemented in Response to Russia's Invasion of Ukraine</u>
- US Commerce Control List
- US Commerce Country Chart