



Executive Policy
Trade Control Compliance

Policy Statement

The Tennessee Valley Authority (TVA) is committed to conducting its business with openness, honesty and integrity, and in full compliance with U.S. laws and regulations that restrict exports and govern international business activities ("Trade Control Laws"). Every director, officer, employee, and contractor of TVA involved in activities that may trigger trade compliance must understand the basic elements of such laws and comply with them at all times. TVA's compliance with these Trade Control Laws is critical to protecting the interests of both TVA and U.S. national security.

Consistent with the U.S. Government's national security and foreign policy goals, Trade Control Laws govern transfers of goods and technology to foreign entities and foreign persons, whether in the United States or abroad. The United States has also promulgated sanctions that restrict trade, investment, and financial transactions with certain countries, organizations, and individuals. TVA supports the purpose of these Trade Control Laws -- to ensure that sensitive equipment and technology do not fall into the hands of those who may misuse them.

TVA directors, officers, employees, and contractors shall not, under any circumstances, export, re-export or import a commodity, technical data, or technology, perform a service, or engage in any other transaction, contrary to Trade Control Laws or to TVA policies and procedures. To ensure TVA compliance, all transactions with foreign entities and involving access by foreign persons to TVA facilities and information must be properly screened and (if necessary) licensed or authorized before they occur. Failure to comply with Trade Control Laws and trade sanctions can result in criminal sanctions, civil fines, debarment from government contracting, the loss of U.S. export/import privileges, and imprisonment. These penalties can be levied against TVA and against individuals. Noncompliance by TVA personnel will be met with appropriate disciplinary action, including the possibility of termination.

TVA expects that all of its directors, officers, and employees, and its contractors, wherever located, will adhere to TVA's commitment to compliance with Trade Control Laws. Each TVA director, officer, employee, and contractor is personally responsible for understanding his or her basic compliance duties under Trade Control Laws, for knowing the requirements of TVA compliance procedures where applicable to his or her duties, and seeking appropriate and timely guidance if a Trade Control Laws compliance issue arises.



Policy Intent

It is TVA policy to comply with not only the letter, but also the spirit and intent of all Trade Control Laws, and TVA seeks to avoid any appearance of a violation.

Applicability

This policy is applicable to all TVA directors, officers, employees, and contractors.

Applicable Requirements

U.S. laws and regulations that restrict exports and govern international business activities, including specifically 10 C.F.R. Part 810 ("Assistance to Foreign Atomic Energy Activities"), 10 C.F.R. Part 110 ("Export and Import of Nuclear Equipment and Materials"), and the Export Administration Regulations ("EAR"), 15 C.F.R. Chapter VII, Subchapter C.

Implementation

This policy is implemented by the establishment of standard programs and processes (SPPs), and implementing documents. If you have any questions regarding this statement or TVA's obligations under Trade Control Laws, please contact Ethics & Compliance.

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