

Section Name: CORPORATE POLICIES – LAW
Section No: 7
Policy No: 7.11

Date: 04/12
Supersedes: 10/97

Subject INTERNATIONAL BOYCOTTS

No employee or unit of the Company shall participate or cooperate, directly or indirectly, in or with international boycotts directed against nations friendly to the United States. No employee or unit of the Company shall agree, either orally or in writing, in any way to:

- Refuse to do business with or in such a boycotted country or its companies or nationals;
- Refuse to do business with U.S. companies or persons doing business in such boycotted countries;
- Discriminate against or refuse to do business with any person or company on the basis of national origin, race or religion;
- Furnish boycott-related information (e.g., concerning race, religion, national origin or boycott compliance) about any person or company to such a boycotting company or country;
- Comply with such boycott-related shipping requirements; or
- Use a letter of credit containing such boycott-related restrictions.

PROCEDURE

1. Any unit or employee requested to participate in any boycott activity shall immediately report the request to the Law Department.
2. A "request" may be written or oral, and may include a solicitation, bid, invitation, directive, legend or instruction asking for certain of the information described above, or that certain actions described above be taken or not taken. Boycott-related requests may be made on invoice, letter of credit, contract bid or similar document. Examples of boycott-related requests may include, for example:
 - Negative certificate as to origin of goods;
 - Agreement to comply with laws of boycotting country;
 - Agreement to furnish boycott information about a company; or
 - Agreement not to ship through a boycotted country.

Updates:
Law Department

References:
Corporate Principle:
 1.1, Legal and Ethical Conduct
Corporate Policy:
 7.9, Antitrust Compliance

Related Topics

Section Name	Policy No	Subject
CORPORATE POLICIES – LAW	7.22	Export Restrictions
CORPORATE POLICIES – LAW	7.9	Antitrust and Competition Law Compliance
CORPORATE PRINCIPLES	1.1	Legal and Ethical Conduct