



Export control checklist for the recruitment/stay of persons from third countries (countries outside EU)

You can find further information and support on the homepage of the Staff Unit Export Control:

<https://www.uni-heidelberg.de/en/institutions/university-administration/division-1-law-and-committees/export-control>

With the help of this checklist, it is to be ensured in the decentrally organised onboarding process of personnel that the recruitment or stay of persons from third countries does not violate export control regulations.

It is the responsibility of your institution resp. of the responsible scientists to check the questions below to the best of their knowledge. Please note that deliberate omission to disclose information can lead to legal consequences.

Documentation has to be done for external audits by customs.

1. Embargos on persons

Is there a personal embargo against the person or a relative of the person (a check is only possible if the name is identical)?

If this is the case, the person may not be recruited/admitted.

Note: So-called "general authorisations" exist for certain third countries.

Help: See „Personal embargo measures“ on the Export Control homepage under
SERVICE - Export control areas of responsibility

(Direct link: [Finanzsanktionsliste](#) German only)

2. Country Embargos

Does the person have the nationality of a country against which embargo measures exist?

If this is the case, it has to be checked whether this embargo causes that the person may not be recruited/admitted.

Help: See „Country embargo measures“ on the Export Control homepage under SERVICE
- Export control areas of responsibility

(Direct link: [Länderembargos Zoll](#) German only)

3. Dual-Use

Dual-use goods, dual-use knowledge or dual-use technologies primarily serve civilian purposes, but can also be used for military or terrorist purposes. It has to be ensured that persons from third countries do not gain physical or electronic access to such goods, knowledge, processes, technologies, documents or files in your facility or as part of IT-solutions.

Is there a possibility in your area that dual-use goods, dual-use knowledge or dual-use technologies that are not in the public domain or not related to basic scientific research could be transferred to persons from third countries?

If this is the case, you have to ensure that the existing prohibitions or approval requirements are complied with. The Staff Unit Export Control will support you in this.

Help: See „Work aid index of keywords“ on the Export Control homepage under SERVICE
- Export control areas of responsibility

(Direct link: [Gemeinsames unverbindliches Stichwortverzeichnis BAFA](#) German only)

4. US export control law

Related to the area in which the person to be recruited/admitted is to work:

Are there US goods or goods with US components to be exported (goods, technology, software (if source code can be viewed); this does not include: PC/smartphone/PKI chip card/smart card)?

Or, in case of dual-use matters, are US persons involved in the project/research?

If this is the case, it must be checked whether US export control law, for which the USA claims extraterritoriality, applies. The Staff Unit Export Control will support you in this.

Please do not hesitate to ask for advice from the Staff Unit Export Control.

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