

International Information Exchange Policies and Procedures

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1. INTRODUCTION

VITA is a United States non-profit corporation that provides its members with the ability to develop and promote open technology standards. Subject to limitations imposed by United States law as described below, VITA membership is open to all persons worldwide and VITA employees, agents, and members who may be engaged in various international information exchanges.

United States laws, which facilitate global security and promote United States foreign policy, govern many types of international information exchanges and the provision of services related thereto. These laws concern embargoes, economic sanctions, and restrictions on the export of certain United States technology to foreign persons, entities, and governments.

1.1. Policy Statement

As technology and the world around us grow more complex, so do legal and ethical obligations. Nevertheless, every organization must be guided by a clear understanding of legal requirements and ethical principles. Thus, while it remains an international organization, VITA is committed to compliance with United States and international laws and has adopted the following International Information Exchange Policies and Procedures (VITA's "IIEPP") to guide its employee, agent, and member conduct in international information exchanges.

1.2. References

Antiterrorism and Effective Death Penalty Act of 1996, Public Law 104-132, 110 Stat. 1214-1319; Arms Export Control Act, 22 U.S.C. §§ 2771 to 2781; Export Administration Act, 50 U.S.C. §§ 2401 to 2420; International Emergency Economic Powers Act, 50 U.S.C. §§ 1701 to 1706; Trading with the Enemy Act, 50 U.S.C. §§ 1 to 44; United Nations Participation Act, 22 U.S.C. §§ 287 to 287I; Export Administration Regulations, 15 C.F.R. §§ 730.1 to 730.10; Foreign Assets Control Regulations, 31 C.F.R. § 501 to 598; International Traffic in Arms Regulations, 22 C.F.R. §§ 120.1 to 120.29; U.S. Defense Security Service National Industrial Security Program Operating Manual.

1.3. Compliance Coordination

VITA's international information exchange compliance efforts are coordinated through VITA's Technical Director, who is responsible for:

- A. Rendering yearly reports to the Board of Directors regarding VITA compliance with United States laws and regulations governing foreign information exchanges.
- B. Reporting known or suspected violations of United States laws and regulations governing foreign information exchanges to the Board of Directors.
- C. In conjunction with General Counsel, overseeing the coordination of VITA's responses to regulatory agency investigatory requests.
- D. In conjunction with General Counsel, ensuring that VITA's IIEPP is kept up to date with any changes in the law.
- E. Monitoring the effectiveness of VITA's IIEPP.
- F. Coordinating periodic internal audits of VITA's IIEPP.

1.4. Additional Audits and Reports

In addition to regular audits to be performed by the Technical Director, VITA's Executive Director and General Counsel may conduct audits as needed to further ensure compliance with VITA's IIEPP. The results of all audits will be reviewed by the Technical Director who, with the Executive Director and/or General Counsel, will prepare findings and recommendations that shall be presented to the Board of Directors for review and approval. The Board of Directors may adopt any recommendations presented, which may include additional measures to correct any weaknesses observed during the audits.

1.5. Training

The success of VITA's IIEPP depends on employees, agents, and members developing a clear understanding of applicable laws and regulations. VITA is committed to developing this understanding and makes training available through its website located at <http://www.vita.com> that is free of charge. The website contains the current VITA IIEPP, training modules, and reference materials. It also contains useful links to the regulatory agencies where current technology control lists, and lists of restricted, embargoed, and sanctioned countries, companies, and individuals can be found.

1.6. Reporting Suspected Violations

- A. Effective administration of VITA's IIEPP requires cooperation between VITA and its employees, agents, and members. Accordingly, any questionable, unauthorized, or illegal activity, whenever discovered, must be immediately reported to the Technical Director for review and evaluation.
- B. Any person may submit a good faith complaint regarding perceived violations. Once received, VITA is committed to investigating and responding to any report of violation.
- C. VITA follows a zero-tolerance standard for willful violations of its IIEPP by employees, agents, and by VITA members. Accordingly, following an investigation, any verified violation may lead to disciplinary action, up to and including termination of employees and agents or revocation of VITA membership.

1.7. Other Laws Governing International Information Exchanges

United States statutes and regulations governing foreign transactions and practices are complex. VITA's IIEPP provides general guidelines for compliance with statutes and regulations specific to VITA's present operations as outlined in Section 1.2. Questions regarding other statutes or regulations potentially affecting international information exchanges should be directed to the Technical Director at techdir@vita.com.

2. UNITED STATES EMBARGO AND ECONOMIC SANCTIONS PROGRAMS COMPLIANCE

United States trade embargoes and economic sanctions programs further United States foreign policy objectives and are administered by the Department of Treasury's Office of Financial Assets Control ("OFAC"). Similarly, the Export Administration Regulations ("EAR"), administered by the Department of Commerce, prohibits United States persons and entities from providing information or taking any other action to assist in the design, development, production, or use of nuclear explosive devices or missiles in or by certain countries.

The EAR also prohibits the provision of information and other assistance in the design, development, production, stockpiling, or use of chemical or biological weapons in or by any country, worldwide. Related to this restriction, the International Traffic in Arms Regulations ("ITAR"), administered by the Department of State, prohibits the export of defense articles and the provision of defense services to certain countries as listed in the ITAR.

Penalties for civil violations of United States embargoes and economic sanctions laws can exceed \$50,000.00 for individuals and \$1,000,000.00 for organizations. Criminal penalties can include fines ranging from \$50,000 to \$10,000,000 and may include imprisonment for up to 30 years.

2.1. Policy Statement

VITA complies with United States embargoes and sanctions programs that may restrict its employees and agents from doing business with certain countries, groups, and individuals, including organizations associated with terrorist activity, narcotics trafficking, proliferation concerns, and foreign militaries with interests adverse to the United States. Accordingly, all VITA employees, agents, and members are required to comply with United States statutes and regulations, this policy, and the procedures set forth below.

2.2. Prohibited Parties

A. A "Prohibited Party" is defined as:

1. Any person, entity, or government appearing on the Specially Designated Nationals List ("SDN List") maintained by OFAC.
2. Any person or entity while in, and the governments of, Cuba, Iran, and Sudan (collectively, "embargoed countries").
3. Any person or entity that is an agent or otherwise affiliated with the government of an embargoed country or that is associated with a party on the SDN List.
4. Any financial institution located in or affiliated with the governments of an embargoed country; that is owned or controlled by parties in Burma; or that is otherwise listed on the SDN List, to include the Iranian banks of Sepah and Saderat.
5. A "Proliferation Concern", defined as:
 - i. Any person or entity on proliferation lists maintained by the Department of State.
 - ii. Any person or entity associated with or located in a country of nuclear or missile proliferation concern as listed on Appendix 1 where facts indicate the person or entity is directly or indirectly involved in a nuclear or missile proliferation activity to include the design, development, production, or use of nuclear devices or missiles, components, or subsystems.
 - iii. Any person or entity directly or indirectly involved in the design, development, production, stockpiling, or use of chemical or biological weapons.

B. "Prohibited Parties" may also include certain designated persons and entities from the Balkans (Serbia), Cote d'Ivoire (Ivory Coast), Iraq, Liberia, North Korea, Syria, and Zimbabwe, as OFAC sanctions programs may prohibit or severely limit exports and transactions with these persons and countries. The majority of such persons and entities are on the SDN List and restrictions on them must be assessed on a case-by-case basis.

2.3. Restriction on Prohibited Services and Transactions with Prohibited Parties

- A. Benefits of VITA membership include participation in standards development through collaboration with other VITA members; use of VITA email reflectors and electronic bulletin boards; discounts for VITA materials and sponsored conferences; and advertising space, all of which may be considered “services” by OFAC. Accordingly, VITA will not, through its employees or agents, provide such benefits of membership or any other form of services to a Prohibited Party, except as otherwise provided herein.
- B. This restriction does not apply to services provided to persons who are nationals of embargoed countries not residing in those countries at the time of a requested service so long as the person certifies that: (1) they will not access the VITA website or other VITA services from an embargoed country; (2) they will not render any payments to VITA while in an embargoed country; (3) they will not render any payments to VITA from a financial institution located in an embargoed country or located in the country of Burma; (4) they will not render any payments to VITA from the Banks Sepah or Saderat or from a bank or account under the control of the government of an embargoed country or the country of Burma; (5) they will not otherwise take any action in violation of U.S. law; (6) they are not an agent of the government of an embargoed country; and (7) they are not listed on, or affiliated with, a person or entity on the SDN List or any other list of prohibited persons and parties.
- C. Upon evidence of a false certification or violation of a certification, VITA will deny membership or revoke the membership of any person.

2.4. Prohibited Party Screens

- A. Prior to granting VITA membership, conference attendance, or entering into any transaction such as the sale of VITA materials, the identification of all relevant parties will be made through information provided on the VITA membership application, credit card authorization, phone number verification, and other available identity verification procedures.
- B. All relevant parties will be screened against the SDN List and other available prohibited party lists, documentation of which will be maintained by VITA for period of VITA’s existence plus five years.
- C. If a match is discovered, VITA will take reasonable steps to verify the identity of the party and contact the relevant issuing authority, whether it is the OFAC Licensing Department, European Union Directorate, or other authority, to determine what types of exports, services or transactions are prohibited.
- D. The OFAC Licensing Department will also be contacted in instances where information suggests a relevant party is living in or from a country subject to a limited sanctions program.
- E. The Technical Director will assure that only the most recent Prohibited Party lists are consulted in the Prohibited Party Screen, and will further be responsible for re-screening existing membership and any party to an ongoing transaction on an annual basis to ensure that they have not been added to the lists.
- F. Investigations to determine whether a party appears on the above lists as a Prohibited Party may be performed by the Technical Director through use of a commercially available and verified software program approved by the Board of Directors.

2.5. Embargoed Country Internet Protocol Address Blocking

Because many services are available via its members-only pages, and as a preventative measure, VITA maintains an Internet Protocol Address Block List that prevents access to its members-only pages by computers located in embargoed countries. The VITA server is programmed to consult this list before permitting access to such pages.

2.6. Specific Licenses to Permit Otherwise Prohibited Activities

In limited cases, specific licenses to permit activities otherwise prohibited may be obtained from OFAC. Any request for an OFAC license to do business with a Prohibited Party must first be approved by VITA's Executive Director and then proposed to the Board of Directors. The Board of Directors will then decide whether to approve the request and submit a license application to OFAC.

2.7. No Facilitation

United States persons and entities are prohibited from facilitating or otherwise indirectly assisting in restricted activities. Accordingly, no VITA employee or agent may steer individual inquiries from persons in embargoed countries to non-United States persons or otherwise facilitate the provision of services in the hope of being able to provide indirectly what cannot be done directly by a United States person.

2.8. Foreign Military Concerns

- A. A foreign military concern is defined as any person or entity that is an agent or component of, provides services to, or is otherwise affiliated with the military of one of the below listed countries.
1. Countries for which the United States maintains a comprehensive arms embargo, consisting, as of the date of the implementation of this IIEPP, of Burma, China, Liberia, Somalia, and Sudan.
 2. Countries subject to United Nations Security Council arms embargoes consisting, as of the date of the implementation of this IIEPP, of Afghanistan (Taliban), Democratic Republic of the Congo, Cote d'Ivoire (Ivory Coast), Iran, Iraq (limited), Lebanon, Liberia, North Korea, Sierra Leone, Somalia, and Sudan.
 3. Countries for which the United States has a policy of denying licenses and other approvals for exports and imports of defense articles and defense services, consisting, as of the date of the implementation of this IIEPP, of Belarus, Cuba, Iran, North Korea, Syria, and Venezuela.
 4. Countries for which it is the policy of the United States to deny licenses, other approvals, exports and imports of defense articles, destined for or originating in, unless falling within certain enumerated exceptions, consisting, as of the date of the implementation of this IIEPP, of Afghanistan, Democratic Republic of the Congo, Haiti, Iraq, Libya, Rwanda, and Vietnam.
 5. Countries which the United States Secretary of State has determined have repeatedly provided support for acts of international terrorism, consisting, as of the date of the implementation of this IIEPP, of Cuba, Iran, North Korea, Sudan, and Syria.

- B. In the furtherance of world peace and the security and foreign policy of the United States and its allies, VITA will not, through its employees or agents, participate in the provision of any services to any foreign military concern, to include the provision of membership in VITA, attendance at VITA conferences, and any and all services related thereto.

3. UNITED STATES EXPORT CONTROLS COMPLIANCE

The EAR and ITAR regulate exports of certain products and technical information.

The EAR regulates the export of products, technology, and software with commercial or military applications (also referred to as "dual use" items). A detailed listing of items for which a license to export is required is provided on the EAR Commerce Control List ("CCL"), a copy of which is located at <http://www.bis.doc.gov>.

The ITAR controls articles designed, developed, adapted, modified, used, repaired, or manufactured for military or defense purposes that are listed on the United States Munitions List ("USML"), a copy of which is located at <http://pmdtc.state.gov>, information regarding such articles, and technical assistance related to such articles (known as "defense services").

Penalties for violations of the EAR and ITAR can include fines up to \$1,000,000.00 or five times the value of the exports at issue, and may result in a denial of export privileges and imprisonment for up to 10 years.

3.1. Policy Statement

VITA does not manufacture any products and its policy is not to export any information or provide any service that is controlled under the EAR or ITAR. Rather, VITA develops open standards constructed from publicly available information provided by its members. Those standards are used by a broad range of manufacturers world-wide in products with a variety of commercial and military applications. Although VITA's standards may appear in military applications, they contain no export controlled information and are not developed using any controlled information. Nevertheless, VITA is committed to compliance with all United States export control laws and regulations. Accordingly, all VITA employees, agents, and members are required to comply with these laws, this policy, and the procedures set forth below.

3.2. Export Control Basics

- A. Under the EAR and ITAR, an export can be either "Direct" or "Deemed."
1. A "Direct Export" is the actual shipment or transmission of items and technical information subject to the EAR or ITAR out of the United States. Direct exports may be made by mail, telephone, electronic mail, or facsimile; through shipment; via hand-carried materials; as a result of presentations; over the Internet; and/or by any other means. An item or information is also considered exported if it is sent to a foreign subsidiary of a United States company or organization.
 2. A "Deemed Export" is the release of technical information or software (visually, electronically, or in any other medium) subject to the EAR or ITAR to a foreign national in the United States. This type of export is an area of special concern to VITA because of the varied and intangible ways of transferring information, which may include conference presentations, conversations or meetings with foreign nationals.

- B. A "Foreign National" is defined by the EAR and ITAR as any person who is not a United States citizen or national; not a United States lawful permanent resident (e.g. "Green Card holder"); not a person granted asylum; and not a person granted refugee status. It also includes any foreign interest or entity effectively controlled by a foreign interest.
- C. A "Foreign Interest" is any foreign government, agency of a foreign government, or representative of a foreign government; any form of business enterprise or legal entity organized, chartered, or incorporated under the laws of any country other than the United States or its possessions and trust territories; and any person who is not a citizen or national of the United States.

3.3. The EAR Publicly Available Exclusion

- A. "Publicly available" information is not subject to EAR controls.
- B. Under the EAR, information will be considered publicly available where it is already published or will be published by becoming generally accessible to the interested public in any form, including:
 - 1. Publication in periodicals, books, print, electronic, or any other media available for general distribution to any member of the public or to a community of persons interested in the subject matter, such as those in a scientific or engineering discipline, free or at a price that does not exceed the cost of reproduction and distribution.
 - 2. Readily available at libraries open to the public or at university libraries.
 - 3. Patents and published patent applications available at any patent office.
 - 4. Released at an open conference, meeting, seminar, trade show, or other open gathering.
 - 5. Arises during, or results from, basic and applied research in science and engineering, where the resulting information is ordinarily published and shared broadly within the scientific community without restriction.
 - 6. Is educational information that is released by instruction in catalog courses and associated teaching laboratories of academic institutions.

3.4. The ITAR Public Domain Exclusion

- A. Information in the "public domain" is not subject to ITAR controls.
- B. Under the ITAR, information will be considered in the public domain where it is published and is generally accessible or available to the public:
 - 1. Through sales at newsstands and bookstores.
 - 2. Through subscriptions which are available without restriction to any individual who desires to obtain or purchase the published information.
 - 3. Through second-class mailing privileges granted by the United States government.
 - 4. At libraries open to the public or from which the public can obtain documents.
 - 5. Through patents available at any patent office.

6. Through unlimited distribution at a conference, meeting, seminar, trade show, or exhibition, generally accessible to the public, in the United States.
7. Through public release (i.e., unlimited distribution) in any form (e.g., not necessarily in published form) after approval by the cognizant United States government department or agency.
8. Through fundamental research in science and engineering at accredited institutions of higher learning in the United States where the resulting information is ordinarily published and shared broadly in the scientific community.

3.5. Publicly Available and Public Domain Information Only

- A. VITA, through its employees and agents, does not transfer or otherwise export any information subject to the EAR or ITAR. Rather, VITA only circulates publicly available and public domain information that is not subject to export controls. Accordingly, all information exported by VITA employees and agents shall meet the requirements of the publicly available or public domain exclusions.
- B. The publicly available and public domain exclusions do not apply to information regarding encryption; information related to nuclear, chemical, or biological weapons and missile technology; or information related to naval nuclear propulsion plants. Accordingly, no information exchanged by VITA employees or agents will concern such topics.

3.6. Classified Information and Information Subject to Other Government Restrictions

- A. The EAR and ITAR public information exclusions do not apply to classified information or information subject to government contractor agreed restrictions on dissemination that have not been released by cognizant government agencies.

Examples of such restrictions include requirements for pre-publication review by the government with right to withhold permission for publication; restrictions on prepublication dissemination of information to foreign nationals or other categories of persons; or restrictions on participation of foreign nationals or other categories of persons in research.

- B. VITA does not possess or accept classified information or information subject to government contractor agreed restrictions on dissemination that have not been released by cognizant government agencies.
- C. Each member of VITA that is a party to a government contract is required to meet its applicable contractual obligations and must satisfy the requirements for ITAR compliance. This is consistent with longstanding VITA policy that authors obtain necessary approvals before submitting any materials at VITA working groups, meetings, and conferences.
- D. In addition, all VITA electronic bulletin board postings, conference presentations, or other information submissions shall only be permitted following certification by submitters that:
 1. They are an authorized representative of their employer or other associated company.
 2. They have full and complete authority from the author and owner of the material to provide the information for free and unlimited dissemination by VITA.
 3. The material is provided free of any restriction on use or disclosure to others, to include foreign nationals.

4. No information contained within the material is controlled for export under the EAR, ITAR, or other government regulation.
 5. No information contained within the material is classified or subject to government contractor agreed restrictions or, if the document has been released from classification and restrictions from the cognizant government agency, that they have transmitted a copy of a complete and valid release from the cognizant government agency to VITA's Technical Director.
 6. They agree to indemnify and hold harmless VITA from any damage or expense that may arise in the event of a breach of any of the certifications set forth above.
- E. Prior to conference presentations or meetings, VITA will provide members with notice that no information exchanged may contain classified information or information subject to government contractor agreed restrictions unless the information has been released from classification and/or restrictions from the cognizant government agency, and the presenter of such information has provided a copy of a complete and valid release from the cognizant government agency to VITA before presentation of the information if any restrictions on dissemination were previously in place at any time.

3.7. No Provision of Defense Services

- A. Defense services consist of any of the following:
1. The furnishing of assistance, including training, to foreign persons, whether in the United States or abroad, in the design, development, engineering, manufacture, production, assembly, testing, repair, maintenance, modification, operation, demilitarization, destruction, processing, or use of defense articles.
 2. The furnishing to foreign persons of any ITAR controlled technical data in the United States or abroad.
 3. Military training of foreign units and forces, regular and irregular, including formal or informal instruction of foreign persons in the United States or abroad or by correspondence courses, technical, educational, or information publications and media of all kinds, training aid, orientation, training exercise, and military advice.
- B. Defense services can be found even when only public domain information is provided.
- C. No VITA employee or agent will provide defense services.
- D. Information on defense articles shall not be posted, discussed, distributed, or otherwise exchanged at VITA meetings, or VITA Standards Organization ("VSO") electronic bulletin boards.
- E. Information on defense articles shall not be posted, discussed, distributed, or otherwise exchanged at VITA meetings, conferences, or other VITA communication channels in response to any specific request for such information. This prohibition applies to all VITA employee, agent, and member exchanges, to include email communications. Members requesting information on the scope of this restriction should review the United States Munitions List as contained in the International Traffic in Arms Regulations.
- F. Prior to any VITA conference, presentation, or meeting, VITA will provide notice of the preceding Section 3.7.D and 3.7.E.

3.8. Email Communications

- A. Information contained in email communications is considered an export if transmitted to a foreign national or if transmitted outside the United States.
- B. The publicly available and public domain exclusions do not generally apply to information contained in email exchanges.
- C. Accordingly, unless already qualifying as publicly available or public domain information, email communications by and between VITA and its members and foreign nationals or foreign locations, to include any attached electronic documents, must not relate to technology listed on the CCL or a defense article listed on the USML.

3.9. Electronic Bulletin Board Postings

All electronic documents posted by VITA on the VITA website and by VITA members on VITA Standards Organization ("VSO") electronic bulletin boards shall be uploaded only by the owner of the information. There is no charge for such postings, which are open for posting to all VSO members and open for viewing by all VITA members.

3.10. Publications

- A. All VITA publications, to include the VMEbus Handbook and ANSI/VITA standards, are available for download or sale in CD-ROM format through the VITA website to any VITA member or member of the public at a cost that is either free or at a price not exceeding the cost of reproduction and distribution.
- B. If any VITA publications are to become available at a price exceeding the cost of reproduction and distribution, copies of such publications will be made available at public libraries prior to any change in price.

3.11. Conferences

VITA conferences are only conducted in the United States and are open to the public. However, attendance may be limited on a first-come, first-served basis and to those selected on the basis of relevant scientific or technical competence, experience, or responsibility. VITA may charge a reasonable registration fee for conference attendance and attendees may take notes at conference presentations. Because of export control limitations, all conference presentations must include at least five United States persons as attendees.

3.12. International Travel and Shipments

To the extent any VITA technical data, software, or other property is being carried overseas, is being transferred to a foreign person during travel, or is otherwise being exported, VITA employees and/or agents will comply with all applicable export control regulations.

3.13. Records Maintenance

- A. Paper and electronic media documenting VITA's compliance with this policy and any controlled export, if any, to include export applications and licenses, memoranda, notes, correspondence, contracts, financial documents, and other records that relate in any way to information exchanges with foreign persons, entities, or government will be maintained in an orderly and accessible manner to comply with United States statutes and regulations.

- B. United States export control regulations require that records relating in any way to controlled exports, even if exported under an exception or exemption, be retained for at least five years from the time of export. However, as records may be requested by government agencies after that time, VITA will maintain all such records for period of VITA's existence plus five years. Regardless of how long maintained, records implicated by pending government requests will not be destroyed or disposed of without the written authorization of the agency concerned.

Appendix 1: Countries of Nuclear or Missile Proliferation Concern*

Afghanistan
Albania
Algeria
Andorra
Armenia
Azerbaijan
Bahrain
Belarus
Burma
Cambodia
China (PRC)
Comoros
Cuba
Djibouti
Egypt
Georgia
India
Iran
Iraq
Israel
Jordan
Kazakhstan
Korea, North
Kuwait
Kyrgyzstan
Laos
Lebanon
Libya
Macau
Micronesia, Federated States of
Moldova
Mongolia
Oman
Pakistan
Qatar
Russia
Saudi Arabia
Syria
Taiwan
Tajikistan
Turkmenistan
Ukraine
United Arab Emirates
Uzbekistan
Vanuatu
Vietnam
Yemen

* Found in Supplement 1 to 15 C.F.R. Part 740: Country Group D.

Appendix 2: Export Controls & Economic Sanctions Certification

Compliance with United States export controls set forth in the Export Administration Regulations and the International Traffic in Arms Regulations and with economic sanctions programs administered by the Office of Foreign Assets Control are of critical concern to global security. To protect this concern, the interests of VITA, and, at the same time, to facilitate the appropriate public release of any intended information submission in accordance with United States statutes and regulations, VITA requests that you make the following certification. This request applies regardless of whether you work for a government, university, or commercial entity or are self-employed.

VITA website pages are accessible worldwide and each viewing, download, or other transfer of information from the VITA website constitutes an export to the viewer's geographic location and country of nationality. However, United States export controls do not apply to information that is "publicly available" or in the "public domain." Accordingly, consistent with longstanding VITA policy, all VITA members offering, posting, or otherwise submitting written or electronic materials to include those submitted to the VITA website, at VSO meetings, at VITA conferences, or who submit such materials through email reflectors hosted by VITA must ensure that all necessary company, government, or other clearances for free and unlimited publication of information contained in submitted documents are obtained prior to submission.

By clicking the "I Agree" button below, you certify that you are an authorized representative of your employer or other associated entity, if any, as listed in your current VITA membership account and that, as an authorized representative of such company ("you") certify that: (1) you have full and complete authority from the author and owner of the material to provide the information for free and unlimited dissemination by VITA; (2) the material is provided free of any restriction on disclosure to others, to include foreign nationals; (3) No information contained within the material is controlled for export under the EAR, ITAR, other United States government regulation, foreign country laws, or international treaty; (4) that no information contained within the material is classified or subject to contractor agreed restrictions on dissemination; or if the document has been released from classification or restriction from the cognizant United States or foreign government agency, you have transmitted a copy of a complete and valid release from the cognizant United States or foreign government agency to techdir@vita.com; (5) That neither you nor your company is listed on the Specially Designated Nationals and Blocked Persons List, available at <http://www.treas.gov/offices/enforcement/ofac>, or any other list of prohibited persons and parties; and (6) that you and your company agree to indemnify and hold harmless VITA from any damage or expense that may arise in the event of a breach of any of the certifications set forth above.

[I AGREE]