

Guidelines for Permissible & Prohibited Activities with Tianjin University

January 19, 2021

On December 22, 2020, the Department of Commerce Bureau of Industry & Security (BIS) added Tianjin University (TJU) in China to the Entity List. BIS places organizations and individuals on the Entity List because there is reasonable cause to believe they may be involved in activities that are contrary to U.S. national security and foreign policy. **This designation significantly restricts Georgia Tech's (GIT) activities with TJU.**

The guidance below is not intended to address all possible scenarios and does not serve as blanket approval or disapproval. Please consult with Sheila Cranman in the Office of Ethics & Compliance on any and all proposed activities with TJU—case-by-case analysis is required. **Violations of Entity List restrictions, even if inadvertent, carry criminal and civil penalties.** Please distribute this guidance to those at Georgia Tech involved with TJU.

Background

GIT and TJU have entered into an agreement with the Government of the City of Shenzhen to create a joint Institute in the city of Shenzhen, the Georgia Tech Shenzhen Institute (GTSI). GIT, TJU, and GTSI are separate legal entities. GIT degrees granted at GTSI are GIT non-thesis degrees. GIT admission at GTSI is completed through GIT. There are no GIT research or research labs at GTSI. GIT's involvement at GTSI is purely educational. GTSI is governed by the Joint Management Committee (JMC) which consists of 2 members on behalf of the Shenzhen municipal government, 3 members from GIT (Steven McLaughlin, Provost, Yves Berthelot, Vice Provost International Initiatives & Tong Zhou, Director of GIT at GTSI) and 3 members from TJU (GIT counterparts). JMC only handles major business issues such as investments, salaries, appointment of dean, etc. that do not typically require an export license.

Permitted Activities

- Public domain exclusion: GIT may share public domain information with TJU.
- Educational exclusion: GIT may share course materials published in the course catalogues with TJU.
- GIT can receive compensation from GTSI for approved GIT educational services provided to GTSI.
- GTSI Joint Management Committee (JMC) business activities.
- Photo op with GIT & TJU faculty/staff.
- There are no restrictions on receiving imports from TJU.
 - Caution: GIT cannot return imported item to TJU. That would be a prohibited export

Prohibited Activities

- GIT cannot export anything to TJU, its faculty, staff and employees.
- GIT cannot give any gifts & office supplies to TJU, its faculty, staff, and employees. This prohibition includes even lapel pins & pencils.
- GTSI cannot facilitate on behalf of GIT exports and/or gifts to TJU.
- GIT cannot give/send/export U.S. software programs (and other items) that TJU may no longer be able to access from the United States due to its Entity List Designation.

Case by case analysis is required for any and all activities with Tianjin University. Please consult with Sheila Cranman in the Office of Ethics & Compliance. Please email asklegal@gatech.edu and copy Sheila Cranman sheila.cranman@legal.gatech.edu.