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**DEPARTMENTS OF JUSTICE, COMMERCE, AND TREASURY ISSUE
JOINT COMPLIANCE NOTE ON VOLUNTARY SELF-DISCLOSURE OF
POTENTIAL VIOLATIONS**

WASHINGTON, D.C.— The Department of Justice, Department of Commerce’s Bureau of Industry and Security (BIS), and the Department of the Treasury’s Office of Foreign Assets Control (OFAC) today issued a joint compliance note focusing on the voluntary self-disclosure policies that apply to U.S. sanctions, export controls, and other national security laws, including recent updates to certain of those policies. Today’s note marks the second collective effort by the three agencies to inform the private sector about enforcement trends and provide guidance to the business community on compliance with U.S. sanctions and export laws.

“American businesses play a vital role in defending our national security, because they are gatekeepers for sensitive technologies and key participants in the financial system,” said Assistant Attorney General for National Security Matthew G. Olsen. “Responsible companies that come forward as soon as they learn of potential sanctions and export control violations will benefit from the protections of these self-disclosure policies.”

“When it comes to protecting our cutting-edge technology from falling into the wrong hands, industry is our first line of defense,” said Assistant Secretary of Commerce for Export Enforcement Matthew S. Axelrod. “As this joint compliance note makes clear, we need companies to tell us when they have potentially violated our rules and offer them concrete benefits for doing so.”

The compliance note describes the voluntary self-disclosure policies of BIS, the Department of Justice’s National Security Division, and OFAC, and highlights recent updates related to these policies. Additionally, the compliance note highlights the Financial Crime Enforcement Network (FinCEN)’s Anti-Money Laundering and Sanctions Whistleblower Program, which incentivizes individuals in the United States and abroad to provide information to the government about violations of U.S. trade and economic sanctions, in addition to violations of the Bank Secrecy Act.

“As adversaries leverage increasingly sophisticated efforts to evade international sanctions and export controls, it’s more important than ever to maintain open communication between the public and private sectors,” said OFAC Director Andrea Gacki. “By taking advantage of our voluntary self-disclosure policy, companies can both help themselves and help us protect our financial system.”

The note underscores the importance of an effective and robust compliance program. If a company discovers a potential violation, whether it is an administrative or criminal violation, that company must promptly disclose and remediate. Not only does such reporting make the disclosing company potentially eligible for significant mitigation, but it also alerts national security agencies to activities that may pose a threat to the national security and foreign policy objectives of the U.S. Government.

The full compliance note is available [here](#).