

**BUREAU OF INDUSTRY AND SECURITY
FREQUENTLY ASKED QUESTIONS
ADDRESS SCREENING
CURRENT AS OF AUGUST 23, 2024**

Q1: Do I have an obligation to screen both the name and address of a party to an export transaction to identify any red flags?

A1:

- BIS strongly recommends screening both the name and address of a party to an export transaction to comply with license requirements that may apply to certain addresses and to monitor certain “red flags” that require additional due diligence.
- Notably, a license is required, to the extent specified on the BIS Entity List (see [supplement no. 4 to part 744 of the EAR](#)), for the export, reexport, or transfer (in-country) of any item subject to the EAR when an entity is using an address that BIS has determined presents a high diversion risk and has added to the Entity List.
 - Exporters can use the [Consolidated Screening List](#) to search for addresses by leaving the ‘name’ field blank, turning ‘fuzzy name’ off, and entering an address in the ‘address’ field.
- In addition, near-matches to addresses on the Entity List and co-location with a listed entity are red flags that require additional due diligence.

Q2: What if the name or address of the company I want to export to is a near match to a name or address on the Entity List?

A2:

- As this is a "red flag," BIS recommends that detailed due diligence be undertaken. You should conduct due diligence by examining other factors to determine if any companies or other persons that are party to this transaction are the same as the listed entity. Such factors may include, but are not limited to, the company’s name, address, corporate officers, business activities, contact information. You may be able to locate this information via the company’s website or through internet search results.
- Minor differences between a listed address and the address used on export paperwork should generally be considered immaterial, and you should accordingly consider the address a match. However, such otherwise minor differences will take on greater importance when the license requirement is based on the address itself, such as when a specific address is listed on the Entity List as an Address with High Diversion Risk. For example, BIS would consider the following scenarios to constitute a match despite certain differences:

- The addresses largely match, but there is a difference in the type of roadway or room number listed; for example, “Hopewell Building, 123 Queens Road East, Hong Kong” should be considered a match for “Hopewell Building, 123 Queens Street East, Hong Kong.” Similarly, “Suite 3, 4/F, 123 Main Street, Hong Kong” should be considered a match for “Room 03, 4th Floor, 123 Main Street, Hong Kong.”
- There are slight differences in the spacing or spelling of road names, when other relevant details of the address match. For example, “Suite 2, Commodore Building, 123 FaYuen street, Hong Kong” should be considered a match for “Suite 2, Commodore Building, 123 Fa-Yuan Street, Hong Kong.”
- There are details such as the building name missing, but the remainder of the address has enough detail to confirm the match. For example, “Room 4, 10/F, Commodore Building, 123 FaYuen Street, Mongkok, Hong Kong” would be considered the same as “Room 4, 10/F, 123 FaYuen Street, Mongkok, Hong Kong.”
- The above examples are fictitious and do not correspond to addresses that BIS has listed.
- The above examples are not an exhaustive list of cases in which BIS considers an address to match. If there are any variations in spelling or sub-building elements that prevent you from confidently determining that two addresses *do not match*, then you should treat them as matches. If you have difficulties making such a determination, you should seek official guidance from BIS.

Q3: What if a company I want to export to is at the same address as (e.g., co-located with) a listed entity?

A3:

- This is a “red flag” and the exporter must undertake sufficient due diligence to verify that the company co-located with the listed entity is not, in fact, the listed entity and does not intend to transfer (in-country) the requested items to the listed entity.
- Additionally, pursuant to [Section 744.11 of the EAR](#), BIS may identify certain addresses as Addresses with High Diversion Risk and add these addresses to the Entity List. When an address is listed on the Entity List as an Address with High Diversion Risk, the involvement of any party at that address performing the role of a Purchaser, Intermediate Consignee, Ultimate Consignee, or End-User in a transaction subject to the EAR would trigger a license requirement, regardless of the entity involved. The specific license requirements associated with that address will be listed in the License Requirement column on the Entity List next to that address entry on the Entity List.

Q4: I have a request to ship an EAR99 item to a customer on the Entity List. The Entity List entry says that company requires a license for all items subject to the EAR, but elsewhere on the Entity List it says that licenses are required to that address only for items on the Commerce Control List or Supplement No. 7 of Part 746. Which license requirement applies?

A4:

- If one of your prospective customers is on the Entity List, then the license requirements that apply to that transaction are those in the License Requirement column that appears in the same row of that entity's entry on the Entity List. In your example, the license requirement applies to exports, reexports, and transfers (in-country) involving all items subject to the EAR when that listed entity is a party (as described above) to the transaction.
- If this entity's address is separately listed as an Address with High Diversion Risk on the Entity List but there is a less restrictive license requirement for that address, then the more restrictive licensing requirement associated with the specific entity would apply.