



**Bureau of Industry and Security**  
U.S. Department of Commerce  
*Where Industry and Security Intersect*

FOR IMMEDIATE RELEASE  
April 29, 2021  
[www.bis.doc.gov](http://www.bis.doc.gov)

BUREAU OF INDUSTRY AND SECURITY  
Office of Congressional and Public Affairs  
(202) 482-1069

## **SAP RESOLVES ALLEGATIONS OF EXPORT CONTROL LAW VIOLATIONS WITH \$3.29 MILLION ADMINISTRATIVE SETTLEMENT**

WASHINGTON – On April 29 2021, Kevin J. Kurland, Acting Assistant Secretary for Export Enforcement, Bureau of Industry and Security (BIS) of the U.S. Department of Commerce, announced an administrative settlement of \$3,290,000 with SAP SE (SAP), a multinational software company based in Walldorf, Germany. SAP also agreed to complete three audits of its export compliance program over a three year period. SAP voluntarily self-disclosed potential violations of the Export Administration Regulations (EAR) to BIS, and cooperated with the investigation conducted by the Boston Field Office of BIS’s Office of Export Enforcement.

“The Bureau of Industry and Security strongly encourages companies, including software providers, to maintain robust export compliance programs to prevent violations of the EAR,” said Mr. Kurland. “If violations do occur, submitting a voluntary self-disclosure of the violations to BIS will be a significant mitigating factor in any penalties imposed.”

This settlement resolves BIS’s allegations that, during a period including December 2009 through September 2019, SAP engaged in conduct prohibited by the EAR when it exported SAP products including software, upgrades, and patches from the United States to various end users located in sanctioned countries, including Iran, without the required export licenses. The items were controlled for encryption and national security reasons. The U.S. Department of Justice and Office of Foreign Assets Control of the U.S. Department of the Treasury also entered into agreed-upon resolutions with SAP involving related conduct of concern.

BIS’s mission is to advance U.S. national security and foreign policy objectives by ensuring an effective export control and treaty compliance system and promoting continued U.S. strategic technology leadership. Among its enforcement efforts, BIS is committed to preventing U.S.-origin items from supporting Weapons of Mass Destruction projects, terrorist activities, or destabilizing military modernization programs. For more information, please visit [www.bis.doc.gov](http://www.bis.doc.gov).