

# Securing Advanced AI, HPC, and Emerging Technologies

## Export Controls, Sanctions & Trade

The U.S. government's AI Action Plan and related policy measures make it clear that artificial intelligence ("AI"), high-performance computing ("HPC"), and advanced chips exports will remain under the highest scrutiny for national security risks. The policy objective is twofold: preserve U.S. technology and economic leadership while preventing diversion, espionage, and prohibited uses of critical U.S. chips and technology.

With advanced AI chip exports planned for the Middle East region—through AI hubs and campuses, hyperscalers' data centers, and sovereign cloud initiatives—organizations face a dual challenge: enabling innovation at scale while maintaining compliance with U.S. export controls, sanctions, and security requirements that are often embedded within U.S. export authorizations.

FTI Consulting's Export Controls, Sanctions & Trade ("ECST") practice, leveraging the capabilities of our national security and cybersecurity teams, helps clients address this challenge by embedding right-sized and risk-based controls across the full lifecycle of advanced U.S. AI chips' exports. With decades of relevant experience and a market-leading multidisciplinary team, we support hyperscalers, data center operators, and generative AI companies in developing and deploying full-stack AI control packages aligned with emerging U.S. regulatory expectations.<sup>1</sup>

### HOW WE CAN HELP

We design integrated export compliance and security frameworks that align with U.S. export requirements and licensing conditions, sanctions regimes, cybersecurity standards, and national security requirements—while remaining mindful of minimizing impact to business operations.

Unlike one-size-fits-all solutions, FTI Consulting builds bespoke modular, risk-tiered controls that scale with each project, which could include:

- Designing secure export compliant architectures for sovereign AI cloud platforms.
- Supporting semiconductor firms, hyperscalers, or data centers with comprehensive Know Your Customer ("KYC") / Supplier / Compute protocols.
- Securing logistics for the shipments and returns of advanced U.S. AI chips.
- Embedding trade compliance safeguards into large-scale digital infrastructure, data centers, supercomputing laboratories, or AI zones, smart cities, and hubs.

<sup>1</sup> <https://www.whitehouse.gov/presidential-actions/2025/07/promoting-the-export-of-the-american-ai-technology-stack/>

## CONTROL DOMAINS & OUR CAPABILITIES

| Domain                                                        | Risks Addressed                                                                                                                          | Our Capabilities                                                                                                                                                                                                                                                                     |
|---------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>AI Chips - Transit and Custody</b>                         | Diversion during shipment, repair, or return; tampering in transit                                                                       | <ul style="list-style-type: none"> <li>Chain-of-custody verification; chip-level telemetry support and auditable, secure returns or repairs management</li> </ul>                                                                                                                    |
| <b>Compute Access, AI Model Governance, and Cybersecurity</b> | Unauthorized training, retraining, or export of AI models; prohibited military-end use exploitation                                      | <ul style="list-style-type: none"> <li>Usage logging; use and output validation frameworks testing for military or prohibited end use or end users</li> <li>Zero-trust architecture; NIST, CMMC, and FedRAMP alignment</li> <li>Incident detection and response support</li> </ul>   |
| <b>End-User/Use and Counterparty Controls</b>                 | Hidden affiliates in sensitive jurisdictions; sanctioned counterparties; third-party risks presented by suppliers, vendors, or customers | <ul style="list-style-type: none"> <li>Automated affiliation mapping, continuous screening against restricted party lists</li> <li>Know-Your Customer / Supplier / Compute protocols</li> <li>Modular Technology Control Plans ("mTCPs") based on EAR/ITAR best practices</li> </ul> |
| <b>Affiliation and Organizational Risk</b>                    | Insider compromise, social engineering, shadow users, negligent disclosures                                                              | <ul style="list-style-type: none"> <li>Enhanced trade compliance due diligence, inclusive of affiliation risk-management and red-flag detection</li> <li>Validation, transaction testing, and training</li> </ul>                                                                    |

## WHY FTI CONSULTING

**Multidisciplinary Expertise** – FTI Consulting combines former regulators, investigators, attorneys, technologists, and compliance professionals across export controls, sanctions, U.S. national security, and cybersecurity.

**Global Experience** – Engagements span sovereign entities in the Gulf, MENA AI/HPC deployments, semiconductor manufacturers, hyperscalers, generative AI companies, and U.S. chipmakers.

**Proven Impact** – We have supported compliance programs tied to multi-billion-dollar AI infrastructure projects and U.S. export license conditions.

**Practical Delivery** – FTI Consulting implements pragmatic, regulator-trusted controls—bridging strategy, compliance, and execution.

## OUR EXPERTS' EXPERIENCE

FTI Consulting provides the risk and compliance backbone that allows organizations to innovate with AI and advanced chips—securely, lawfully, and at scale.

**Hyperscale buildout in Gulf state** – Designed governance and technical safeguards tied to U.S. export and sanctions requirements.

**AI HPC research facility** – Deployed risk-tiered KYC/KYS and insider threat protocols, aligned to U.S. license conditions.

**Vision2030 urban and digital infrastructure in Saudi Arabia** – Integrated compliance safeguards into project governance and operations.

### JAMES NEEDHAM

Senior Managing Director  
+1 202.312.9211

[james.needham@fticonsulting.com](mailto:james.needham@fticonsulting.com)

### ERIC RUDOLPH

Senior Managing Director  
+1 718.290.4201

[eric.rudolph@fticonsulting.com](mailto:eric.rudolph@fticonsulting.com)

### BRECK HEIDLBERG

Managing Director  
+1 470.285.9252

[breck.heidelberg@fticonsulting.com](mailto:breck.heidelberg@fticonsulting.com)

### MORIAL SHAH

Senior Director  
+1 281.908.1256

[morial.shah@fticonsulting.com](mailto:morial.shah@fticonsulting.com)

### IAN ROBINSON

Senior Director  
+1 336.314.7409

[ian.robinson@fticonsulting.com](mailto:ian.robinson@fticonsulting.com)

*The views expressed herein are those of the author(s) and not necessarily the views of FTI Consulting, Inc., its management, its subsidiaries, its affiliates, or its other professionals. FTI Consulting, Inc., including its subsidiaries and affiliates, is a consulting firm and is not a certified public accounting firm or a law firm.*

FTI Consulting is an independent global business advisory firm dedicated to helping organizations manage change, mitigate risk and resolve disputes: financial, legal, operational, political & regulatory, reputational and transactional. FTI Consulting professionals, located in all major business centers throughout the world, work closely with clients to anticipate, illuminate and overcome complex business challenges and opportunities. ©2025 FTI Consulting, Inc. All rights reserved. [fticonsulting.com](https://fticonsulting.com)