Best Practices for Export and Re-Export Shipments

❖ Develop written policy against allowing exports or services to contribute to terrorism or programs of proliferation concern.

❖ Identify one person, who reports to senior management, as the ultimate party responsible for oversight of the company's export control compliance program.

❖ Create an export control compliance program that is integrated into the company's overall regulatory compliance, security, and ethics programs.

❖ Ensure that relevant company personnel receive regular training in export control compliance responsibilities.

❖ Seek to use only freight forwarders that also observe these best practices.

❖ Communicate the appropriate Export Control Classification Number (ECCN) or other classification information for each export and re-export to the end-user, ultimate consignee, and freight forwarder.

❖ Screen all parties to proposed transactions for the presence of parties who are: subject to an order denying export privileges; on the Unverified List; on the Entity List; or on any list of the U.S. Government sanctions parties, and maintain a record of such screening.

❖ Screen all exports and re-exports against a list of embargoed destinations, and maintain a record that such screening was performed.

❖ Take appropriate steps to know who the end-user is and to determine whether the item will be re-exported or incorporated in an item to be re-exported for shipments to, from, or through transshipment hubs.

❖ Have in place compliance and/or business procedures to be immediately responsive to theft or unauthorized delivery for shipments to, from, or through transshipment hubs.

❖ Pay heightened attention to Red Flag Indicators on the BIS Website and in the "Know Your Customer Guidance" set forth in the EAR for shipments to, from, or through transshipment hubs.

❖ Implement procedures that address any questions raised by suspicious transactions, including inquiries, clarification of questions raised, refraining from the transaction, and reporting potential or actual violations to law enforcement.

For further information, please visit us at:
http://www.gtpiconsulting.com

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