

Table of Contents

1. Corporate Commitment and Compliance Structure
 - 1.1. Corporate Commitment and Policy Statement
 - 1.2. Export Organization and Responsible Officials
2. Summary of Export Laws and Regulations - Jurisdiction of Exports
 - 2.1. International Traffic In Arms Regulations (ITAR)
 - 2.2. Export Administration Regulations (EAR)
 - 2.2.1.1. Anti-Boycott Compliance
 - 2.3. Bureau of Alcohol, Tobacco, Firearms & Explosives, Imports Branch
 - 2.3.1.1. Understanding Permanent Imports and the USMI Screening Imports
 - 2.4. Office of Foreign Asset Controls
3. Definitions
 - 3.1. Export
 - 3.2. U.S. Person
 - 3.3. Foreign Person
 - 3.4. Re-export or Retransfer
 - 3.5. Commodity Jurisdiction
 - 3.6. Defense Article
 - 3.7. Technology (EAR)
 - 3.8. Technical Data (ITAR)
4. The Export Process
 - 4.1. Commodity Jurisdiction & Classification
 - 4.1.1. Determination Criteria
 - 4.1.2. Commodity Jurisdiction Process
 - 4.2. Registration with the U.S. Department of State
 - 4.2.1. Mergers, Acquisition, and Divestitures
 - 4.3. License Determination
 - 4.3.1. ITAR Permanent/Temporary Export & Import Authorizations
 - 4.3.2. Commonly Used ITAR Exemptions
 - 4.3.3. EAR Export Authorizations
 - 4.3.4. Commonly Used EAR Exceptions
 - 4.4. D-Trade: Obtaining ITAR Licenses
 - 4.5. SNAP-R: Obtaining EAR Licenses
 - 4.6. Shipping
 - 4.6.1. Implementing USG Export Authorizations
 - 4.6.2. Destination Control Statements
 - 4.6.3. Shipping Documentation
 - 4.6.4. AES

5. Business Development, Sales and Contracts

- 5.1. Marketing Your Services/Hardware/Software
- 5.2. Participating in Conferences, Trade Shows and Providing Demonstrations
- 5.3. Licensing Requirements for Proposals/Contract Negotiations
- 5.4. Agents and Representatives – Part 130 Fees, Commissions
- 5.5. Brokering Requirements
- 5.6. Foreign Corrupt Practices Act

6. Purchasing/Procurement/Subcontracts

- 6.1. Foreign Suppliers – Authorizations Required
- 6.2. U.S. Suppliers – Their Responsibilities
- 6.3. In-House Contract Employees/Subcontractors/Consultants/Vendors
- 6.4. Returning Hardware for Repair/Rework/Replacement

7. Engineering

- 7.1. Commodity Jurisdiction Process
- 7.2. Marking data ITAR or EAR
- 7.3. Responsible for the Company Hardware/Software/Data Commodity Matrix
- 7.4. Reviewing and Approving Technical Data/Software/Technology for Release to U.S. or Foreign Persons

8. Task/Project/Program Management

- 8.1. Summary of Responsibilities
- 8.2. Implementing Approvals
- 8.3. Using the Correct Destination Control Statements
- 8.4. Record Keeping Requirements
- 8.5. Keeping Approvals Up-to-Date
- 8.6. Working on-site at Customers Facilities

9. Information Technology

- 9.1. Policy on All Electronic Devices
- 9.2. Storing and Controlling Technical Data/Technology
- 9.3. Management of Product Information Posted on Internet
- 9.4. Intranet Export Compliance Website
- 9.5. Foreign Person Access

10. Traffic/Logistics

- 10.1. Summary of Responsibilities
- 10.2. Mail Room Procedures

- 10.3. Temporary Import Bonds and Carnets
- 10.4. Selecting Freight Forwarders/Custom Brokers and Power of Attorneys
- 10.5. Mandatory Automated Export System Filing Requirements
- 10.6. Schedule B and the Harmonized Tariff Schedule

11. Internal Controls

- 11.1. Foreign National Employees – Controls, Restrictions and Licensing
- 11.2. Security
 - 11.2.1. Technology Control Plan
 - 11.2.2. Visitor Requests & Logs
 - 11.2.3. Foreign Visitors and Tours
 - 11.2.4. Badging Requirements
 - 11.2.5. Physical Security and Theft
- 11.3. International Travel
 - 11.3.1. Hand-Carry of Electronic Devices and/or Data
 - 11.3.2. Hand-Carry of Company Products for Demonstrations
 - 11.3.3. Hand-Carry of Lap Tops

12. Restricted/Prohibited Activities and Screening Requirements

- 12.1. OFAC/Screening for Restricted/Prohibited Exports and Transfers
- 12.2. Screening of Denied Persons and Restricted Parties
- 12.3. Screening of Export to Prohibited and Embargoes Countries
 - 12.3.1. Proscribed Countries
 - 12.3.2. Countries of Concern (Embargo/Sanctions/Special Concerns)
- 12.4. Red Flags

13. Record Keeping Requirements

- 13.1. Business Development
- 13.2. Engineering and Information Technology
- 13.3. Subcontracts/Contracts
- 13.4. Task/Project/Program Management
- 13.5. Traffic/Logistics
- 13.6. Security
- 13.7. Export/Import Compliance

14. Training and Audits

- 14.1. Training for All Employees
- 14.2. Training for Export Control Officers
- 14.3. Training Curriculum
- 14.4. Audit Program

15. Export Violations and Penalties

- 15.1.1. Activities Treated as Violations
- 15.1.2. Penalties Under the ITAR
- 15.1.3. Penalties Under the EAR
- 15.1.4. How to conduct an Investigation
- 15.1.5 Reporting Violations and the Voluntary Disclosure Process