EXPORT POLICY & PROCEDURES MANUAL

TABLE OF CONTENTS

V. DESTINATION SCREENING

    A. Overview – Where is the Product Going?

    B. Transactions Involving Embargoed Countries (Policy)

        1. Option 1

        2. Option 2

    C. Screening for Diversion Risks (Policy)

VI. END-USER SCREENING

    A. Overview – Who is Receiving the Product?

    B. New Business Partner Record (Policy)

    C. RPL Screening (Policy)

VII. END-USE SCREENING

    A. Overview – What is the intended use of the product?

    B. Prohibited End-Uses (Policy)

VIII. RECORDKEEPING

    A. Overview

    B. Export Records Required to Be Retained (Policy)

IX. EXPORT COMPLIANCE TRAINING

    A. Initial Staff Training (Policy)

    B. New Employee Training (Policy)

    C. Refresher Training of Relevant Personnel (Policy)

    D. Key Personnel Training (Policy)

X. EXPORT COMPLIANCE AUDITING

    A. Internal Reviews (Policy)

    B. Audits and External Reviews (Policy)

XI. COMMUNICATIONS WITH GOVERNMENT AGENCIES

    A. Questions and Routine Interaction re Classification and Licensing Issues (Policy)

    B. Written Inquiries (Policy)

    C. Government Visits (Policy)

XII.   PROBLEM MANAGEMENT

      A.   Internal Reporting of Suspected Problems Required (Policy)

      B.   Voluntary Self-Disclosure (Policy)

LIST OF APPENDICES

A. Employee Acknowledgement

B. Compliance Personnel Contact Info and Organizational Chart

C. International Order Flow Chart

D. Revision Control Chart

E. Product and Technology Classification Procedure

F. Determining Whether an Export License is Required

G. Export Shipment Procedure

H. Diversion and Prohibited End-Use "Red Flag" Screening

I. RPL Screening Procedure

J. Prohibited End-Use Screening Guidelines

K. Employee International Travel Procedure

L. Foreign National Hiring Procedure

M. Problem Management Protocol

N. Communications with Government Agencies Protocol

O. Export Classifications List

P. New Business Partner Form

Q. Recordkeeping Procedure

R. Sample End-User Certificate

S. Export Control Training Log

T. Countries Subject to U.S. Sanctions and Embargoes

U. Sample ITAR Technology Control Plan

V. List of Useful Websites