



EMCP - Structure

Export Management Compliance Program

- 1) Management Commitment
- 2) Documented Compliance policies and procedures
 - Systemic compliance throughout a company
 - Define policies & operating procedures for all export processes
- 3) Streamlined up front decisions
 - Jurisdiction, Classification and license determination
- 4) Appropriate safeguards throughout the order process
- 5) Compliance Screening Policies and procedures
 - List oriented (DPL, entity, SDN, etc)
 - Diversion Risk red flags check
 - End-uses Checks (proliferation)
 - Antiboycott Checks
- 6) Accountability, Audit Trail and Smart Compliance Business Strategies
 - Responsible Personnel and functions
 - Record Keeping (EAR part 762)
 - Training
 - Audits
 - Escalation and Notification

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