# TEMPLATE: ICP Audit Module[[1]](#endnote-1)

The ICP audit module below will enable your enterprise to verify compliance with the procedures mandated by your enterprise’s Internal Compliance Program. The ICP audit module will allow your enterprise to systematically assess each of the eight, core elements of your ICP, to document the review of each element, and to ultimately ensure compliance with all applicable STC laws and regulations.

**ELEMENT # 1: Management Commitment to STC Compliance**

[Within the self-assessment columns, “Y/N/U” stands for Yes/No/Uncertain or Indeterminate.]

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| **ELEMENT 1: Management Commitment to STC Compliance** | **Y** | **N** | **U** | **Initials \_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_\_\_ Comments** |
| Is management commitment communicated on an ongoing basis by:   * Enterprise publications? * Enterprise awareness posters? * Daily operating procedures? * Other means, e.g., bulletin boards, in meetings, trainings, etc.? |  |  |  |  |
| Does management issue a formal STC Policy Statement (hereafter, the “Statement”) that communicates a clear commitment to strategic trade controls? |  |  |  |  |
| Has a person been assigned the responsibility for issuing the enterprise’s policy statement? |  |  |  |  |
| Is the formal policy statement distributed to all employees and contractors? |  |  |  |  |
| Who is responsible for distribution of the Statement? |  |  |  |  |
| Is there a distribution list of those who should receive the Statement?  Have the following departments received the Statement?  \_\_ All Senior Management  \_\_ Sales  \_\_ Order Processing  \_\_ Customer Service  \_\_ Purchasing  \_\_ Finance  \_\_ Accounting  \_\_ Legal  \_\_ Engineering and Field Services \_\_ Export Administration \_\_ Shipping \_\_ Traffic \_\_ In house Travel Agency  \_\_ [Others] |  |  |  |  |
| What method of communication is used (letter, email, intranet, etc.)? |  |  |  |  |
| Does the distribution of the Statement include employee signed receipt and personal commitment to comply? |  |  |  |  |
| Is the Statement from current senior management communicated in a manner consistent with management priority correspondence? |  |  |  |  |
| Does the formal Statement explain why corporate commitment is important from your enterprise’s perspective? |  |  |  |  |
| Does the Statement indicate that no sales will be made contrary to national STC laws and regulations? |  |  |  |  |
| Does the Statement convey the proliferation and diversion risk of the items to be exported? |  |  |  |  |
| Does the formal Statement emphasize end-use/end-user prohibitions?  Proliferation activities of concerns:   * Nuclear? * Chemical and Biological Weapons? * Missile? * Military-related? |  |  |  |  |
| Does the formal Statement contain a description of penalties applied in instances of non-compliance?   * Imposed by your national authorities? * Imposed by your enterprise? |  |  |  |  |
| Does the formal Statement include the name, position, and contact information, such as: e-mail address & telephone number of the person(s) to contact with questions concerning the legitimacy of a transaction or possible violations? |  |  |  |  |
| What management records will be maintained to verify compliance with procedures and processes (including the formal Statement)?   * Who is responsible for keeping each of the management records? * What is the period of retention? * Where will the records be maintained? * In what format will the records be retained? |  |  |  |  |
| Are adequate resources (time, money, personnel, training, high-level support, and technical expertise) dedicated to the implementation and maintenance of the ICP? |  |  |  |  |
| Is management directly involved through regularly scheduled meetings with empowered compliance personnel? |  |  |  |  |
| Is management involved in the auditing process? |  |  |  |  |
| Has management implemented a team of ICP managers/officers who meet to review challenges, procedures and processes and who serve as the connection to the employees with compliance responsibilities? |  |  |  |  |
| Does the Statement describe where employees can locate the ICP Manual (on the enterprise intranet or specific person and location of hard copies)? |  |  |  |  |
| Are there written procedures to ensure consistent, operational implementation of this Element? |  |  |  |  |
| Is a person designated to update this Element, including the Statement, when management changes, or at least annually?  (Note in comments the name of the individual). |  |  |  |  |
| If the primary person is unable to perform the responsibilities, is a back-up person designated?  (If not, is a procedure in place to eliminate vulnerabilities of an untrained person proceeding with tasks that could lead to an STC violation?) |  |  |  |  |
| Do employees understand their role in maintaining STC compliance and where they fit in the overall internal compliance system? |  |  |  |  |
| Is the message of management commitment conveyed in employee training through:   * Orientation programs? * Refresher training? * Electronic training modules? * Employee procedures manuals? * Other? |  |  |  |  |
| Is management involved in ICP training to emphasize management commitment to the program? |  |  |  |  |
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| **Determination:** |  |  |  |  |

**ELEMENT # 2: Organizational Structure**

Within the self-assessment columns, “Y/N/U” stands for Yes/No/Uncertain or Indeterminate.

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| **ELEMENT 2: Organizational Structure** | **Y** | **N** | **U** | **Initials \_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_\_\_ Comments** |
| Is there an organizational chart that clearly identifies all STC compliance functions within the enterprise? |  |  |  |  |
| Does each STC compliance responsibility and task have a specific person assigned who is responsible for assuring that it is performed? |  |  |  |  |
| Is there a clear line of responsibility and accountability for STC-compliance related issues within the enterprise? |  |  |  |  |
| Has a Chief Compliance Officer (CCO) and other empowered compliance officials been assigned? |  |  |  |  |
| Does the organizational chart define the CCO as the primary person responsible for ensuring the enterprise’s compliance with the ICP? |  |  |  |  |
| Has the organizational chart been distributed throughout the organization? |  |  |  |  |
| Is the organizational chart promptly updated and disseminated when changes occur? |  |  |  |  |
| Has a backup person been identified for each position with STC compliance-related responsibilities? |  |  |  |  |
| Are there a sufficient number of personnel dedicated to STC compliance functions? |  |  |  |  |
| Have consignees, contractors, customers, and other business partners been informed of the names and contact information of the CCO and other empowered compliance personnel? |  |  |  |  |
| Are there incentives and penalties for employees that meet or fail to meet their STC compliance responsibilities?  If so, are they made available and distributed to new employees at the time of hire? |  |  |  |  |
| Does the enterprise evaluate the STC compliance record of an employee during performance appraisals and factor it into promotion decisions? |  |  |  |  |
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| **Determination:** |  |  |  |  |

**ELEMENT # 3: Transaction Screening Process and Procedures**

Within the self-assessment columns, “Y/N/U” stands for Yes/No/Uncertain or Indeterminate.

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| **ELEMENT 3: Transaction Screening Process and Procedures** | **Y** | **N** | **U** | **Initials \_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_\_\_ Comments** |
| *Product and Technology Classification Checklist* |  |  |  |  |
| Is there a written procedure that describes how items are classified and assigned a Commodity Classification Number (CCN) in accordance with the national control list?   * Does a technical expert (e.g. product classification or lead engineer) within the enterprise classify the items? * Are there procedures that clearly indicate who has the authority to make classification decisions? * If your enterprise does not manufacture the item, does the manufacturer of the item classify it? * Is there a written procedure that describes when a classification request is submitted to the national authorities and who is responsible? |  |  |  |  |
| Has a product and technology classification database been developed? |  |  |  |  |
| Does the database identify each product including a description and model/part number? |  |  |  |  |
| Does the database identify the product’s CCN or ECN? |  |  |  |  |
| Does the database identify a license indicator noting the type of license required for each product and associated development, production and use technology and each intended destination? |  |  |  |  |
| Does an engineering group led by the Lead Engineer/Product Classification Engineers review all current products available for export? |  |  |  |  |
| Does the engineering group identify the products’ technical specifications and associated development, production and use technology? |  |  |  |  |
| Are there procedures for stopping any shipment for a product not in the database or when the information is missing or known to be inaccurate? |  |  |  |  |
| Are there guidelines for all employees (management, engineering, sales, marketing, etc.) regarding technology transfers? |  |  |  |  |
| Are all employees informed on a regular basis of such guidelines and their responsibility to comply with them? |  |  |  |  |
| *Restricted Party Screening Checklist* |  |  |  |  |
| Does the enterprise select one of the following two basic techniques for conducting restricted parties screenings?  \_\_ The customer-based method  \_\_ The transaction-based method |  |  |  |  |
| Is the restricted party list checked against your customer-base?   * Are both the customer name and principal checked? * Is there a method for keeping the customer-base current? * Is there a method for screening new customers? * When screening for parties that already own your equipment and require servicing and training, is the customer screened against the RPST or restricted party lists prior to entering into the transaction? * Has a list or database of all the entities with whom your enterprise does business been created? |  |  |  |  |
| Is the restricted party list checked on a transaction-by-transaction basis?   * Is the name of the ordering party’s firm and principal checked? * Is the end-user’s identity available? If so, is a restricted party check done on the end-user? * Is the check performed at the time an order is accepted and/or received? * Is the check performed at the time of shipment? * Is the check performed against backlog orders when a new or updated restricted party list is published by the national authorities? |  |  |  |  |
| Is there a written procedure to ensure screening of orders/shipments against a restricted parties list? |  |  |  |  |
| Are personnel/positions identified who are responsible for restricted party list screening? |  |  |  |  |
| Is there a procedure to screen transactions against sanctions and embargoes lists to determine whether the destination country is subject to restrictions or prohibitions? |  |  |  |  |
| Is there a procedure to hold or stop orders if a customer and/or other parties are found on the restricted party list? |  |  |  |  |
| In the event there was a match between a customer/vendor and a restricted party, did the employee who discovered the restricted party hold or stop the transaction and notify the appropriate empowered compliance official immediately? |  |  |  |  |
| Does the CCO contact the appropriate governmental official for further instruction when any party involved in the transaction is identified on any restricted parties list? |  |  |  |  |
| Is there a procedure to report all names of customers and/or other parties found on the restricted party list? |  |  |  |  |
| Do the procedures include a process for what lists are used to perform the screening (e.g. EU Consolidated Sanctions list), and if distribution of hard copies is required, who is responsible for their update and distribution? |  |  |  |  |
| Is the restricted party screening documented?  If so, does documentation of screen (whether hard copy or electronic signature) include:   * Name of individuals performing the checks? * Dates the screenings were performed? * Date of current denied person/entity’s information used to perform the check? * Is the date of the restricted party list used to check the transaction documented? Is it current? |  |  |  |  |
| Is the Official Gazette or other relevant, government publications regularly monitored for the addition of new entities to the restricted parties list? |  |  |  |  |
| Has the CCO obtained the latest restricted party lists and disseminated them to all relevant personnel? |  |  |  |  |
| *Diversion Risk Profile* |  |  |  |  |
| Are there procedures in place that ensure that the end-use has been verified as commercial / civil?  Has the end-use been documented during the quotation or order process? |  |  |  |  |
| Are there procedures to screen orders for diversion risk or identify red flag indicators? |  |  |  |  |
| Is a checklist used based upon the red flag indicators? |  |  |  |  |
| Does the written screening procedure identify the responsible individuals who perform the screening? |  |  |  |  |
| Is the potential diversion risk considered at all phases of the order processing system? |  |  |  |  |
| Is a diversion risk checklist documented and maintained on file for each and every order? |  |  |  |  |
| Is a diversion risk checklist documented and maintained on file in the customer profile? |  |  |  |  |
| Is the customer base checked at least annually against the red flag indicators or when a customer’s activities change? |  |  |  |  |
| Is there a procedure to “hold” orders if there is a red flag during the processing of orders? |  |  |  |  |
| Is a person designated to resolve red flags or to report them to the national authorities? |  |  |  |  |
| Have all employees that might possibly come into contact with red flags been trained to identify the red flags? |  |  |  |  |
| Has the enterprise created and maintained a general diversion risk profile containing “red-flag” indicators that signal questionable end-uses? |  |  |  |  |
| Has the internal sales and marketing division screened each transaction against the red flags immediately upon initial contact with the customer or upon receipt of the order? |  |  |  |  |
| Is the diversion risk screen documented on each order or in the enterprise’s customer file whenever new information on the customer becomes available? Is the customer file updated whenever new information on a customer becomes available? |  |  |  |  |
| Before placing new customers on the enterprise’s approved customer list, are the customers screened and files created? |  |  |  |  |
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| **Determination:** |  |  |  |  |

**ELEMENT # 4: Shipment Control**

Within the self-assessment columns, “Y/N/U” stands for Yes/No/Uncertain or Indeterminate.

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| **ELEMENT 4: Shipment Control** | **Y** | **N** | **U** | **Initials \_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_\_\_ Comments** |
| Are there written procedures to ensure that goods/technology and/or services and their quantities correspond to the descriptions set out in instruction / customs documents and / or license authorizations? |  |  |  |  |
| Are there written procedures to verify that transaction screening procedures have been completed prior to shipment and to confirm the accuracy and integrity of the shipping declarations (end-use, end-user, and destination)? |  |  |  |  |
| Do internal procedures explain the screening processes from receipt of order to actual shipment? |  |  |  |  |
| Does the procedure include who is responsible for each screen/check prior to shipment? |  |  |  |  |
| Does the procedure describe when, how often, and what screening is performed? |  |  |  |  |
| Are there assigned personnel responsible for verifying that all checks have been completed prior to shipment? |  |  |  |  |
| Is there a “hold” or “cancel” function and procedures to prevent shipments from being further processed, if needed? |  |  |  |  |
| Are hold/cancel functions implemented? |  |  |  |  |
| Are supervisory or CCO sign-off procedures implemented for shipments deemed to be high risk? |  |  |  |  |
| Does the enterprise have an on-going procedure for monitoring compliance of consignees, end-users and other parties to the transaction? |  |  |  |  |
| Does an empowered compliance official complete a shipment release form for the shipping department before shipping any products out of the country? |  |  |  |  |
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| **Determination:** |  |  |  |  |

**ELEMENT # 5: Auditing and Internal Review**

Within the self-assessment columns, “Y/N/U” stands for Yes/No/Uncertain or Indeterminate.

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| **ELEMENT 5: Auditing and Internal Review** | **Y** | **N** | **U** | **Initials \_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_\_\_ Comments** |
| Are written procedures established to verify ongoing compliance? |  |  |  |  |
| Is there a qualified individual (or auditing group – internal or external party?) designated to conduct internal audits? |  |  |  |  |
| Is there a potential conflict of interest between the auditor and the division/unit being audited? |  |  |  |  |
| Is there a schedule for audits? |  |  |  |  |
| Are internal reviews performed annually, every six months, quarterly, etc.? |  |  |  |  |
| Is there a step-by-step description of the audit process? |  |  |  |  |
| Is a standard audit module or self-assessment tool used? |  |  |  |  |
| If yes, does the audit module or self-assessment tool evaluate: corporate management commitment in all aspects of the audit not just the written Policy Statement Element? |  |  |  |  |
| If yes, does the audit module or self-assessment tool evaluate: formalized, written ICP procedures compared to operational procedures? |  |  |  |  |
| If yes, does the audit module or self-assessment tool evaluate: Accuracy & conformity of export transaction documents by random sampling or 100% verification? |  |  |  |  |
| If yes, does the audit module or self-assessment tool evaluate: Whether there is a current, accurate product/license determination consistent with your country’s STC laws and regulations and control lists? |  |  |  |  |
| If yes, does the audit module or self-assessment tool evaluate: whether correct license authorizations were used for each transaction? |  |  |  |  |
| If yes, does the audit module or self-assessment tool evaluate: maintenance of documents, as stipulated in the written ICP. |  |  |  |  |
| If yes, does the audit module or self-assessment tool evaluate: whether transaction screening is performed and documented as required in the ICP? |  |  |  |  |
| If yes, does the audit module or self-assessment tool evaluate: whether there are flow charts of the various processes for each Element of your ICP? |  |  |  |  |
| If yes, does the audit module or self-assessment tool evaluate: What is used to provide verification that the audits were conducted? |  |  |  |  |
| If yes, does the audit module or self-assessment tool evaluate: whether there is a procedure to stop/suspend transactions if problems arise? |  |  |  |  |
| If yes, does the audit module or self-assessment tool evaluate: whether all key export-related personnel are interviewed? |  |  |  |  |
| If yes, does the audit module or self-assessment tool evaluate: whether there are clear, open communications between all export-related divisions? |  |  |  |  |
| If yes, does the audit module or self-assessment tool evaluate: whether there is daily oversight over the performance of due diligence and screening checks? |  |  |  |  |
| If yes, does the audit module or self-assessment tool evaluate: Does it include sampling of the completed screens performed during the order processing and/or new (or annual) customer screening? |  |  |  |  |
| If yes, does the audit module or self-assessment tool evaluate: Whether compliance procedures and the ICP manual are consistent with any recent changes that have taken place to your national legislation? |  |  |  |  |
| If yes, does the audit module or self-assessment tool evaluate: Whether the enterprise’s training module and procedures are current with national requirements? |  |  |  |  |
| Is there a written report of each internal audit? |  |  |  |  |
| Are there written results of the review? |  |  |  |  |
| Is the appropriate manager notified, if action is needed? |  |  |  |  |
| Are spot checks/informal self-assessments performed? Are they documented? |  |  |  |  |
| Is there evidence of a conflict of interest between the reviewer and the division being reviewed? |  |  |  |  |
| Are records of past audits maintained to monitor repeated deficiencies? |  |  |  |  |
| Is there a “best practice” that should be shared with other divisions in the enterprise to improve effectiveness and efficiency and promote consistency of procedures? |  |  |  |  |
| Are other departments aware of their STC-related responsibilities, e.g., legal dept., human resources, information management, etc.? |  |  |  |  |
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| **Determination:** |  |  |  |  |

**ELEMENT # 6: Training and Education**

Within the self-assessment columns, “Y/N/U” stands for Yes/No/Uncertain or Indeterminate.

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| **ELEMENT 6: Training and Education** | **Y** | **N** | **U** | **Initials \_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_\_\_ Comments** |
| Are there written procedures that describe an ongoing program of STC compliance training and education? |  |  |  |  |
| Do the written procedures clearly describe detailed step-by-step processes that employees are expected to follow? |  |  |  |  |
| Is a qualified individual designated to conduct training and to update the training materials?  (Note in comments the name of the person.) |  |  |  |  |
| If the primary responsible person is unable to perform the responsibilities, is a secondary person designated to back-up the primary designee?  (If not, is a procedure in place to eliminate vulnerabilities of an untrained person proceeding with tasks that might lead to a compliance violation?) |  |  |  |  |
| Is there a schedule to conduct training (including date, time, and place)? |  |  |  |  |
| Does the training component of the ICP include what training materials are used (classroom module, videos, CD/DVD, and manuals)? |  |  |  |  |
| Are training materials accurate, consistent and current with operational policy, procedures and processes?  (If not, note in the comments section what corrective actions are needed.) |  |  |  |  |
| Are attendance logs used for documentation which includes agenda, date, trainer, trainees, and subjects? |  |  |  |  |
| Is frequency of training activities defined? |  |  |  |  |
| Is a list of employees/positions defined who should receive strategic trade control compliance training? |  |  |  |  |
| Are responsible persons trained to understand the interconnection of their roles with other ICP processes and where they fit in the overall program? |  |  |  |  |
| Is the list of employees/positions to be trained consistent with other Elements of the ICP? |  |  |  |  |
| Is a person identified and responsible for keeping the training records? |  |  |  |  |
| Is the location of where these training records are to be maintained included? |  |  |  |  |
| Is the format of how these training records will be maintained noted? |  |  |  |  |
| Do training methods include:   * Orientation for new employees? * Formal (structured setting, agenda, modules used) for management and empowered compliance personnel? * Informal (less structured basis, verbal, daily, on- the-job information exchange)? * Circulation of written memoranda and e-mails to personnel? * Refresher courses and update sessions scheduled? * Employee desk procedure manuals? * Back-up personnel training? |  |  |  |  |
| Does content of training materials include:   * Organizational structure of STC compliance-related departments and functions? * Message of management commitment – STC Policy Statement * The role of the Chief Compliance Officer/ and key empowered compliance officials? * Re-export regulatory requirements? * ICP operating procedures? * The purpose and scope of STC? * Licenses & conditions? * Regulatory changes and new STC requirements? * Destination restrictions? * Item restrictions? * End-Use/End-User Prohibitions? * How to perform and “document” transaction screens and utilize checklists? * Various process flows for each element? * New customer review procedures? * Identification and description of non-compliance? |  |  |  |  |
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| **Determination:** |  |  |  |  |

**ELEMENT # 7: Recordkeeping and Documentation**

Within the self-assessment columns, “Y/N/U” stands for Yes/No/Uncertain or Indeterminate.

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| **ELEMENT 7: Recordkeeping and Documentation** | **Y** | **N** | **U** | **Initials \_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_\_\_ Comments** |
| Are there written procedures to comply with recordkeeping requirements? |  |  |  |  |
| Do the written procedures clearly describe detailed step-by-step processes that employees are expected to follow? |  |  |  |  |
| Are all records in each process included in the records maintained? |  |  |  |  |
| Are the written procedures reviewed for update at least annually and when significant changes occur? |  |  |  |  |
| Are the written and operational procedures consistent? |  |  |  |  |
| Is there a designated employee responsible for management and maintenance of this Element? Is his/her name and contact information provided? |  |  |  |  |
| Identify all other employees who are held accountable for specific responsibilities under this Recordkeeping Element? |  |  |  |  |
| Do the designated employees know who is responsible for the next action to be taken in the process? |  |  |  |  |
| If the primary responsible person is unable to perform the responsibilities, is a secondary person designated to back up the primary designee? |  |  |  |  |
| Where there are no backup designees, are there procedures in place to prevent untrained/unauthorized personnel from taking action? |  |  |  |  |
| Do employees understand the importance of their roles related to the overall recordkeeping requirement? |  |  |  |  |
| Do employees have the appropriate budgetary, staff, and supporting resources to perform their responsibilities? |  |  |  |  |
| Do employees have access to all the appropriate systems, tools, databases, and records to perform their responsibilities and ensure compliance with recordkeeping procedures? |  |  |  |  |
| Is appropriate and specific training provided regarding this Element of the ICP? |  |  |  |  |
| Is the training included on an annual schedule of employee training? |  |  |  |  |
| Have appropriate parties been identified who will retain records? Are names and contact information provided? |  |  |  |  |
| Has the period of record-retention been identified? |  |  |  |  |
| Have secure physical and electronic storage locations for records been identified for the retention of records? |  |  |  |  |
| Have determinations been made regarding the formats that all of the different types of records will be retained in (transaction and administrative)? |  |  |  |  |
| Is there a list of records that are to be maintained?  Has the list been distributed to employees? |  |  |  |  |
| Does the procedure include a list of records to maintain, including the following **Administrative records**:   * A current copy of all applicable governmental STC laws, regulations, and policies. * Commodity classification records? * Correspondences with national licensing authorities re: license requirements or classification? * Written copy of the ICP Manual (current?) * Management's written STC policy statement * End-use/user statement by ultimate consignee and purchaser? * EUCs and IICs? * Documentation of all formal training * Audit Reports   Other administrative records |  |  |  |  |
| Are there instructions for the accurate completion and filing of the following **Transaction records**:   * License application and approvals * Commercial Invoices (with destination control statement) ? * Description of items(s) ? * Air Waybills and/or Bills of Lading Value of shipments? * Proof of Insurance * Purchase Orders * Contracts * Credit Letters * Certificates of Origin * Shipper’s export declaration and all other information related to the transaction? |  |  |  |  |
| Has the enterprise retained ttransaction and administrative records for a minimum of five years?  Have physical / hard-copy records over three years old been archived and stored at an off-site location? |  |  |  |  |
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| **Determination:** |  |  |  |  |

**ELEMENT # 8: Reporting and Corrective Action**

Within the self-assessment columns, “Y/N/U” stands for Yes/No/Uncertain or Indeterminate.

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| **ELEMENT 8: Reporting and Corrective Action** | **Y** | **N** | **U** | **Initials \_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_\_\_ Comments** |
| Has a person within your enterprise been assigned as the point of contact when STC compliance questions arise?  Have the name, telephone number, e-mail address (or any other means of contact) for this person been made readily available to all employees involved in compliance-related activities? |  |  |  |  |
| Are there internal procedures in place to notify management within the enterprise if there is a compliance breach? Is contact information provided for each official in the chain? |  |  |  |  |
| Do the enterprise policy/guidelines address accountability and consequences for non-compliant activity?  Are the appropriate incentives, rewards, requirements, and penalties in place, and has a culture of compliance been fostered to facilitate reporting of any possible acts of non-compliance? |  |  |  |  |
| Are there internal procedures in place to notify the appropriate government authorities when an act of non-compliance is identified? |  |  |  |  |
| Has a central point-of-contact been defined for all communications with the national government and the licensing authorities? |  |  |  |  |
| Is the management chain clearly defined for non-compliance disclosures or for Voluntary Self-Disclosures (VSDs) and are there clear guidelines for such disclosures? |  |  |  |  |
| Do all employees receive strategic trade control awareness training? Does this training detail reporting, escalation, and corrective action requirements? |  |  |  |  |
| Is there a hotline or mechanism for notifying empowered compliance officials of possible violations or STC compliance problems? |  |  |  |  |
| Does the enterprise have an anonymous reporting mechanism for employees? |  |  |  |  |
| Do compliance guidelines provide defined criteria for when a formal internal investigation is required?  If yes, are the procedures to be followed defined?  Are the reporting and documentation requirements defined? |  |  |  |  |
| Is there a corrective action plan that identifies specific remedial actions that are to be taken in the aftermath of a violation?  Is there a timeline for implementation of corrective actions with dates for completion of each measure? |  |  |  |  |
| Are corrective actions assessed on a periodic basis to confirm proper implementation and the elimination of identified vulnerabilities? |  |  |  |  |
| Do compliance guidelines include policy and procedures for follow-up reporting to management and the reporting employee?  Is there a process for evaluating lessons learned? |  |  |  |  |
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| **Determination:** |  |  |  |  |

1. Adapted and modified from: “Audit Module: Self-Assessment Tool,” U.S. Department of Commerce, Bureau of Industry and Security (BIS), Office of Exporter Services, Export Management and Compliance Division, July 2011, <https://www.bis.doc.gov/index.php/forms-documents/doc\_view/10-emcp-audit-module-self-assessment-tool>. [↑](#endnote-ref-1)