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| This important STC Compliance Update is being sent to all businesses which have a commercial relationship with [Insert enterprise name] or one of its subsidiaries that may involve strategic trade control issues. Please forward this Update to all persons at your company whose jobs involve exports of [Insert enterprise name] products. | |
| Critical  Strategic Trade Control (STC) Responsibilities  [Insert enterprise name]’s *STC Compliance* *Policy* states….  *“*[Insert an excerpt of language from your STC Compliance Policy Statement similar to the example below]*”*  *“[ACME Co.]’s ability to export its products, services, technology and technical data around the globe is a privilege that must be carefully safeguarded. We require our employees to understand and abide by all applicable STC laws and regulations and to maintain and adhere to ACME’s internal procedures and processes that govern our compliance with applicable strategic trade controls…”*  Further guidance with respect to this Policy is available at [[insert website address]](http://www.ppg.com). | **As an employee or business partner of**  [Insert enterprise name]**, please be advised of your critical responsibilities regarding your export related transactions with**  [Insert enterprise name]**:**   1. We expect you to:   (a) comply with all relevant STC control laws and regulations,  (b) comply with your obligations under [Insert enterprise name]’s STC compliance policies, controls, and procedures as communicated to you in writing during the course of our business relationship; and  (c) be informed of [Insert enterprise name]’s Internal Compliance Program(“ICP”), especially management’s *STC Compliance Policy* *Statement* and the ICP Manual. Both are available, online at: [insert web hyperlink].   1. We expect you to report to [Insert enterprise name]’s Chief Compliance Officer (CCO) any suspected or actual violations of any strategic trade control laws or regulations that involve items or employees of [Insert enterprise name], to the extent such reporting is legally permitted in your country. [Insert enterprise name] also encourages you to report suspected or actual violations of [Insert enterprise name]’s compliance policies, controls, and procedures.   There are three ways to report a violation:   * [Insert enterprise name]’s confidential, anonymous “Hotline” * [Insert enterprise name]’s online reporting system * Direct email to [Insert enterprise name]’s CCO [email address] * More information on these three reporting methods is available at [insert website address].   Both the Hotline and online reporting system are reviewed by [Insert enterprise name]’s CCO. It is against [Insert enterprise name] policy to retaliate against anyone for making a good faith report of a violation of the law or our internal compliance policies. We are also committed to maintaining the confidentiality and anonymity of such reports, and complying with applicable data privacy laws.   1. Failure to comply with strategic trade control laws or regulations or [Insert enterprise name]’s STC compliance policies, controls or procedures communicated to you in writing during the course of your employment or our business relationship may result in [Insert enterprise name] taking appropriate action, including terminating your employment or our business relationship.   **Please contact** [Insert your enterprise name]**’s Chief Compliance Officer at [**phone #] **if you have any questions or concerns about the above.** |