**TEMPLATE #1: MANAGEMENT STC COMPLIANCE POLICY STATEMENT**[[1]](#footnote-1)

[*The STC compliance policy statement should be drafted on official company letterhead*]

DATE: dd/mm/yyyy

TO: All Employees & Contractors

FROM: Name, President/CEO/Chairman

SUBJECT: Strategic Trade Control Compliance Policy Statement

[Insert name of your enterprise] is committed to compliance with all strategic trade controls (STC) in the [insert appropriate national STC legal authorities]. This commitment extends to promoting strict compliance on an on-going basis with terms and conditions.

It is [insert enterprise name] policy that all employees, comply with the STC policies and regulations set forth by [insert name of your government]. Under no circumstances will exports or transactions be made contrary to [insert name of your country]’s laws and regulations by any individual operating on behalf of [insert enterprise name].

Failure to comply with these laws and regulations may result in the imposition of criminal and/or civil fines and penalties, including jail time and monetary penalties, and employees will be subject to disciplinary action and/or termination.

I ask each of you to take this matter very seriously and to support me in this effort. If you have any questions concerning the legitimacy of a transaction or potential violations, please contact:

[Name, Title, Phone, E-Mail of empowered compliance official]

Note: This Statement of Management Commitment to STC Compliance will be issued on an annual basis or if necessitated by personnel changes, changes in management, or regulatory changes.

[Insert name of the empowered compliance official] is responsible for disseminating this Statement throughout the organization through [insert enterprise name] ICP Manual updates, incorporation into training and presentations, and posting on the [insert enterprise name] Intranet and website.

(NAME)\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_(SIGNATURE)\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_(DATE)\_\_\_\_\_\_\_

President/CEO/Chairman

**TEMPLATE #2: MANAGEMENT STC COMPLIANCE POLICY STATEMENT**[[2]](#footnote-2)

[NOTE: *This policy statement makes explicit reference to “deemed export” controls and controls on intangible transfers of strategic technology*.]

[Insert enterprise name] is committed to contribute towards the policy of nonproliferation through effective compliance with [insert your country’s primary strategic trade control law] and implementing regulations/policies/procedures issued by [insert your government’s designated licensing authority for strategic items].

The [insert enterprise name] and affiliated organs/individuals will not undertake any business or indulge in transfers of strategic goods, technologies, services and information etc., in contravention to national laws, policies and regulations on nonproliferation of nuclear, biological and chemical weapons, their means of delivery or munitions-related items.

Failure to comply may result in the imposition of civil, criminal and/or administrative penalties including termination of service of those involved in unauthorized transactions. Particular attention must be given to transactions involving dual-use/non-listed items usable in WMDs and their delivery systems including related technology/services, and release of technical data to foreign nationals, electronic transmission of data/software, etc.

Every employee of [insert enterprise name] and affiliated entities/individuals whether in [insert the name of your country] or abroad are asked to take the matter seriously and support the enterprise in pursuit of its genuine business interests, upholding reputation and sustenance of legitimate business activities.

For any inquiry/question on legitimacy of a transaction or reports and information on potential strategic trade control violations/non-compliance, please contact the designated authority indicated below:-

(NAME)\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_(SIGNATURE)\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_(DATE)\_\_\_\_\_\_\_

Title/Position:

Phone number:

Email:

**TEMPLATE #3: MANAGEMENT STC COMPLIANCE POLICY STATEMENT**[[3]](#footnote-3)

[NOTE: *This policy statement makes direct reference to the involvement of trade intermediaries such as brokers*]

A MESSAGE FROM THE CHAIRMAN/PRESIDENT/CEO

“The success of this enterprise depends in large part on the business we do overseas.

Strategic trade controls imposed by [insert name of your government] affect a significant proportion of the products we see and many of our overseas markets. We must therefore understand the controls and be certain we comply with them. The purpose of these controls is to limit the supply of technology or strategic goods to countries proscribed, principally for reasons of proliferation, security, or terrorism. It is in the interest of us all that the controls are effective if it makes the world a safer place. For our enterprise it is essential that we comply with all relevant STC legislation: the failure to do so would bring serious penalties for both the enterprise and for the individuals concerned.

I have nominated [insert name of the empowered compliance official (e.g. CCO)]. to be the person with overall responsibility within the enterprise for strategic trade control matters assisted by [insert name(s) of ECOs or ECM] and he/she will be reviewing the effectiveness of our current procedures in light of the [insert your country’s primary strategic trade control legislation] to which we must adhere. But each of us must be aware of our own role and ensure that no items are transferred (remembering that this term also covers the transmission of software or technology by fax, telephone or other electronic media and arranging to move goods between third countries) without due clearance and authorization. Information is available on how strategic trade controls affect your position; make sure you are aware of it.”

(NAME)\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_(SIGNATURE)\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_(DATE)\_\_\_\_\_\_\_

Title/Position:

Phone number:

Email:

[Note: *The policy statement can be circulated as a self-contained policy statement; incorporated in a statement about other regulatory matters; included in a preface to a Code of Ethics or other relevant enterprise publication; included in any induction material the enterprise may produce for new hires; and/or disseminated through an enterprise newsletter/update or via the intranet, so that it is brought to the attention of all staff whose work has any bearing on STC compliance efforts.*]

**TEMPLATE #4: MANAGEMENT STC COMPLIANCE POLICY STATEMENT**

[Note: *This policy statement is the same as the sample found in the ICP Manual, Chapter 1.4*]

To: All personnel

From: [Insert name of Director/Chairman/CEO]

Subject: [Insert enterprise name] Strategic Trade Control Policy

Date: Month Day, Year

The purpose of this policy statement is to communicate our corporate policy on strategic trade control. It is the intent of the [insert enterprise name] to comply with the Strategic Trade Control (STC) laws, regulations, and policies of the [insert national licensing and regulatory agency(s)] of [enter country name].

In order to effectively meet this goal, I have assigned [insert name of empowered compliance official] to be the primary point of contact for all strategic trade control related matters. Mr./Ms. [insert name of designated compliance official] will establish an Internal Compliance Program (ICP) which will define new operating procedures and new responsibilities to ensure compliance with our country’s STC requirements. Under no circumstances will exports or transactions be made contrary to [insert name of your country]’s laws and regulations by any individual operating on behalf of [insert enterprise name].

The [insert country name] is participating in various multilateral export control regimes (MECRs) which control a variety of dual-use and munitions- related equipment, material, software and technology. [Insert enterprise name] manufactures [insert brief description of enterprise products] which are [are not] described by the [insert name of national STC control list(s)]. In many instances our enterprise will require export licenses for international shipment of our products whether or not the commodity is on the [insert name of national STC control list(s)] due to the technology, end-user, destination, and or end-use. Mr./Ms. [insert name of designated compliance official] can provide an explanation of the requirements for licensing regarding all transactions including technical exchanges and advanced sales meetings for our products.

A violation of strategic trade control laws, regulations, or policies could subject [insert enterprise name] and responsible personnel to a variety of administrative, civil, or criminal penalties. Loss of our export or trade privileges would have a significant adverse impact on our sales and ability to remain competitive. Any employee of [insert enterprise name] who willfully violates the rules will be strictly punished which includes possible termination from employment.

As we implement this new Internal Compliance Program (“ICP”), you may discover certain practices or transactions that may not be in compliance with the existing rules. Please identify and report them to Mr. [insert name of designated compliance official] for corrective action who will provide the necessary reporting to [insert national licensing and regulatory agency(s)]. If at any time now or in the future, you discover a possible STC violation you are required to report it to Mr./Ms. [insert name of designated compliance official] who can be reached at [phone number, fax number, and email, if available].

I thank you for your attention and cooperation in our ICP, which will make [insert enterprise name] a stronger, more competitive, enterprise.

Sincerely,

Mr. or Ms. [CEO/Chairman/Director’s name] Title \_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. Adapted and modified from: “Compliance Guidelines: How to Build an Effective Export Management and Compliance Program and Manual,” U.S. Department of Commerce, Bureau of Industry and Security (BIS), Office of Exporter Services, Export Management and Compliance Division, November 2013, <http://www.bis.doc.gov/index.php/forms-documents/doc\_view/7-compliance-guidelines>. [↑](#footnote-ref-1)
2. Adapted and modified from: “Internal Compliance Programme Guidelines,” Pakistan Ministry of Foreign Affairs, Strategic Export Control Division (SECDIV), 3 October 2014, <http://www.mofa.gov.pk/secdiv/documents/ICP-Guidelines.pdf>. [↑](#footnote-ref-2)
3. Adapted and modified from: “Export Control Organisation Compliance Code of Practice,” United Kingdom Department of Trade and Industry (DTI), Export Control Organization (ECO), 23 November 2012, <http://www.berr.gov.uk/files/file8425.pdf> [↑](#footnote-ref-3)