

Bureau of Industry and Security

BIS 2019 | ANNUAL CONFERENCE ON EXPORT CONTROLS

July 9-11 | Washington, D.C.



U.S. Department of State - DDTTC

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Purpose of Controls

- Foreign Policy
 - National Security
 - Human Rights
 - Regional Stability
 - Non-Proliferation
- Foreign policy objectives
 - Support U.S. foreign policy and national security goals
 - Support allies' and partners' foreign policy and national security goals
 - Promote interoperability with allies and partners
 - Keep defense technology out of the hands of adversaries



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Compliance Program - Why?

Consequences (violations) of not having a compliance program:

- Affects foreign policy & national security
- Becomes expensive if you don't – fines & penalties!
- Disrupts your business
- Impacts your reputation



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Key Factors

- Senior officers' commitment to compliance
- Established policies and procedures
- Experienced personnel and training to maintain knowledge base
- Adequate resources dedicated to compliance

The best compliance programs are tailored to the company and its business. They don't need to be complicated – they need to work. For general guidelines, see:
https://www.pmdtc.state.gov/ddtc_public?id=ddtc_kb_article_page&sys_id=4f06583fdb78d300d0a370131f961913



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Compliance Program Elements

Internal compliance program should address:

- | | |
|---|-------------------------------------|
| 1. Organizational structure | 11. Foreign visitors |
| 2. Compliance resources | 12. Record keeping |
| 3. Product classification | 13. Reporting |
| 4. Contracts/marketing screening | 14. License / Agreement maintenance |
| 5. License preparation & implementation | 15. Shipping & receiving processes |
| 6. Exemption Implementation | 16. ITAR training |
| 7. Non-U.S. person employment | 17. Internal monitoring and audits |
| 8. Physical security of the ITAR facility | 18. Voluntary Disclosure |
| 9. Computer network security | 19. Violations and penalties |
| 10. Foreign travel | 20. Brokering |



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Contact Information

- To check on correspondence from our office or find out which Compliance Specialist is assigned to your disclosure, email DTCC-CaseStatus@state.gov
- For all other matters, including substantive questions and inquiries regarding registration submittal or status and referrals, contact the DDTC Response Team
 - Phone number: (202) 663-1282
 - E-mail: DDTCResponseTeam@state.gov
- For general information, please visit DDTC's website
 - <http://www.pmdtc.state.gov/>