# Developing an Effective Internal Compliance Programme

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### **Exemption Reg. 25**

(Transit & Transhipment)

**Industry Consultation** 

**Internal Compliance Programme** 

**Online Permit Application** 

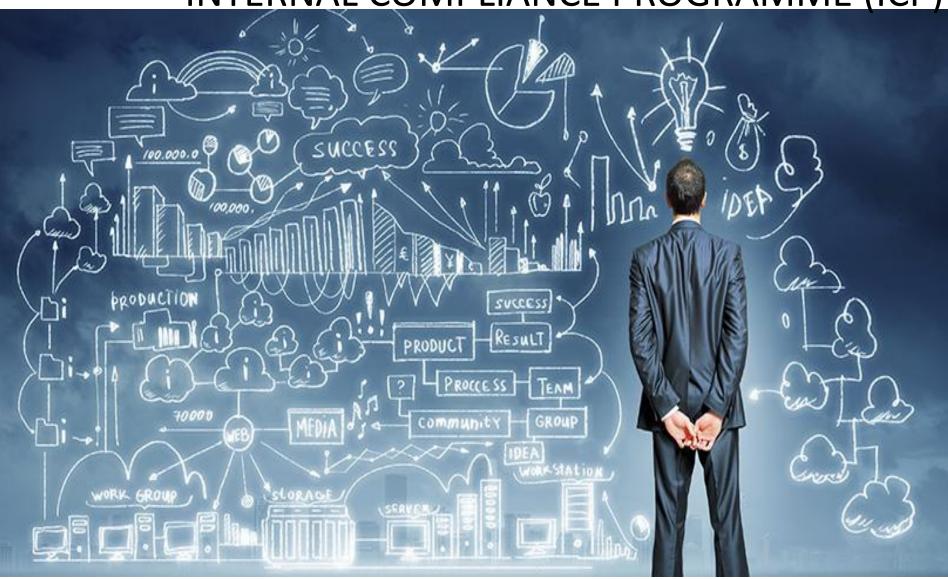
**Strategic Item Finder** 

**Dedicated email and portal** 

admin.sts@miti.gov.my

http://www.miti.gov.my/

INTERNAL COMPLIANCE PROGRAMME (ICP)





What is it?

Why have one?

Mandatory Elements

- It is a set of procedures to be implemented within a company on transactions involving strategic items
- Pre requisite for multiple or bulk permit
- Commitment in ensuring company's compliance with STA and associated Regulations
- The Controls can be done manually or electronically

Single (6 months)

Multiple (2 years)

Bulk (2 years)

Special (1 year)

Why have one? Mandatory Elements

- 2 years validity of approved permit
- Increase clients/importers' confidence when dealing with shipment dates
- Increase export compliance within organisation
- Time and cost saving
- Ability to include additional importer/ end user
- It has no expiry !!! (but updates will be required)



What is it?

Why have one?

**Mandatory Elements** 



**Management Commitment** 

Screening Process

Record Keeping

**Training** 

**Audit** 

**Mandatory Elements** 

- Written company policy
- Awareness within the organisation (not limited to logistic/shipping department)
- Nomination of person(s) responsible for
  - export control and
  - applying for permit
- Clause of export control in contract



What is it?

**Process** 

Why have one?

**Mandatory Elements** 

Mechanism to screen product, End User, End Use and Destination



What is it?

Why have one?

**Mandatory Elements** 

- All records related to transaction of strategic items
- Kept in hardcopy/softcopy
- Maintained for 6 years
- Tracking of remainder quantity and value



Management Commitment Screening Process

Record Keeping

Training

Audit

What is it?

Why have one?

**Mandatory Elements** 

- Training plan export control personnel (at least once in 18 months)
- Incorporate general element of export control (other employees)
- Training materials and details of training recorded



**Management Commitment** 

Screening Process

Record Keeping **Training** 

Audi

What is it?

Why have one?

**Mandatory Elements** 

- Conducted annually (external or internal)
- Audit is focused on export control process and procedures
- Findings recorded
- Corrective action and recommendation measures undertaken

Management Commitment

Screening Process

Record Keeping Training

**Audit** 



## Thank you

















