

CHECK LIST ON INTERNAL COMPLIANCE PROGRAM (ICP)

NO.	CORE ELEMENTS OF ICP	BEST PRACTICES	PROOF OF BEST PRACTICES	CHECK (ATTACHED DOCUMENTS)	
				<u>YES</u>	<u>NO</u>
1.	<u>MANAGEMENT COMMITMENT</u>				
	<ul style="list-style-type: none"> • NOMINATED PERSON RESPONSIBLE FOR EXPORT CONTROL 	WRITTEN APPOINTMENT BY CEO/MD	NAME OF PERSON IN CHARGE AND DESIGNATION	<input type="checkbox"/>	<input type="checkbox"/>
	<ul style="list-style-type: none"> • PERSONS RESPONSIBLE FOR APPLYING PERMIT 	WRITTEN AUTHORISATION FROM CEO/MD/PERSON RESPONSIBLE FOR EXPORT CONTROL	NAME OF PERSON/ PERSONS AUTHORISED TO APPLY FOR PERMIT AND DESIGNATION	<input type="checkbox"/>	<input type="checkbox"/>
	<ul style="list-style-type: none"> • WRITTEN COMPANY POLICY ON EXPORT CONTROL 	WRITTEN EVIDENCE		<input type="checkbox"/>	<input type="checkbox"/>
	<ul style="list-style-type: none"> • AWARENESS OF EXPORT CONTROL 	COMMUNICATING IT THROUGH VARIOUS	PROVIDE COPY OF COMMUNICATION ON	<input type="checkbox"/>	<input type="checkbox"/>

NO.	CORE ELEMENTS OF ICP	BEST PRACTICES	PROOF OF BEST PRACTICES	CHECK (ATTACHED DOCUMENTS)	
				<u>YES</u>	<u>NO</u>
	<p>WITHIN ORGANIZATION</p> <ul style="list-style-type: none"> • CLAUSE IN CONTRACT WITH BUYERS THAT ITEM PURCHASED WILL NOT BE USED FOR WMD OR OTHER ILLEGAL PURPOSES 	<p>MEDIA</p> <p>COMMON CLAUSE IN CONTRACT</p>	<p>EXPORT CONTROL (HANDBOOK, VIDEO, EMAIL ETC)</p> <p>EXAMPLE OF CONTRACT SIGNED</p>	<input type="checkbox"/>	<input type="checkbox"/>
2.	<p><u>SCREENING PROCESS</u></p> <ul style="list-style-type: none"> • IS A SCREENING PROCESS IN PLACE IN THE COMPANY <p>❖ PRODUCT SCREENING ❖ END USER SCREENING ❖ END USE SCREENING</p>	<p>COMPUTER BASED SYSTEM/ IT SUPPORTED</p> <p>SCREENING AGAINST ALL APPLICABLE LIST</p>	<p>DESCRIBE THE SCREENING SYSTEM IN DETAIL</p> <p>IF MANUAL, PROVIDE WRITTEN PROCEDURE FOR SCREENING</p> <p>BRIEF DESCRIPTION OF LOGIC SET WITHIN THE SYSTEM TO PROMPT ALERT</p>	<input type="checkbox"/>	<input type="checkbox"/>

NO.	CORE ELEMENTS OF ICP	BEST PRACTICES	PROOF OF BEST PRACTICES	CHECK (ATTACHED DOCUMENTS)	
				<u>YES</u>	<u>NO</u>
	<ul style="list-style-type: none"> ❖ DESTINATION SCREENING ❖ RED FLAG INDICATORS 	PROCEDURE MANUAL FOR RISK ASSESSMENT	COPY OF THE MANUAL	<input type="checkbox"/>	<input type="checkbox"/>
3.	<u>TRAINING</u> <ul style="list-style-type: none"> • TRAINING PLAN • TYPE OF TRAINING 	WHEN: AT LEAST ONCE IN 18 MONTHS WHO: PERSONAL INVOLVED IN EXPORT CONTROL WHAT: TYPE OF TRAINING BY WHOM: QUALIFIED TRAINER	TRAINING RECORDS	<input type="checkbox"/>	<input type="checkbox"/>
4.	<u>RECORD KEEPING</u> <ul style="list-style-type: none"> • STATUTORY REQUIREMENT FOR RECORD KEEPING: 	6 YEARS	HARDCOPY/ SOFTCOPY		

NO.	CORE ELEMENTS OF ICP	BEST PRACTICES	PROOF OF BEST PRACTICES	CHECK (ATTACHED DOCUMENTS)	
				<u>YES</u>	<u>NO</u>
	<ul style="list-style-type: none"> ❖ END USER STATEMENT ❖ EXPORT PERMIT ❖ DELIVERY VERIFICATION ❖ TECHNICAL SPECIFICATION ❖ INVOICE ISSUED IN RESPECT OF THE SALE OF STRATEGIC ITEM OR UNLISTED ITEMS ❖ PURCHASE ORDERS ❖ NOTES, INVITATION TO BID, REQUESTS FOR QUOTATIONS ❖ SHIPPING DOCUMENTS 			<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

NO.	CORE ELEMENTS OF ICP	BEST PRACTICES	PROOF OF BEST PRACTICES	CHECK (ATTACHED DOCUMENTS)	
				<u>YES</u>	<u>NO</u>
	❖ DOCUMENT ISSUED BY THE RELEVANT AUTHORITY OF IMPORTING COUNTRY			<input type="checkbox"/>	<input type="checkbox"/>
5.	<u>AUDIT</u> <ul style="list-style-type: none"> • SYSTEM AUDIT • PROCESS AUDIT • DOCUMENTATION AUDIT 	AT LEAST ONCE A YEAR	AUDIT RECORDS	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>