



Trade Compliance



integrity
Ethics & Compliance Training

Topic 1 – Export Compliance

1. **Interactive Screen:** Define an export. Why are export controls necessary? Penalties for violations.
2. **Interactive Screen:** Types of export. Direct, re-exports, deemed, and deemed re-export.
3. **Interactive Screen:** Export control regulations and government authorization. Dual-use items and EAR. ECCN and EAR99. ITAR. License requirements. Prohibited lists.
4. **Scenario:** Real-life scenario that focuses on identifying the correct steps to take when exporting.
5. **Key Learning:** Before you export anything, you need to conduct due diligence. You need to check if the export has an ECCN, where the export is going, who it is going to, and what the intended end-use is.
6. **Scenario:** Real-life scenario that focuses on intangible transfers.
7. **Key Learning:** It's important to remember that an export isn't just the transfer of a product to a foreign destination. The transfer of information to a non-national individual who is based in the country is also considered an export.
8. **Assessment:** Five-question quiz on the content presented in this topic.

Topic 2 – Red Flags

1. **Interactive Screen:** Red flags. Customer has little or no business background, vague delivery dates, out-of-the-way destinations, etc. Actions to take when a red flag is identified. Reporting.
2. **Scenario:** Real-life scenario around the action to take when a red flag is identified.
3. **Key Learning:** Red flags must be reported. Reporting mechanisms. Willful blindness is not acceptable. A lack of knowledge will not insulate a company from liability.
4. **Assessment:** Five-question quiz on the content presented in this topic.

Topic 3 – Sanctions and Embargoes

1. **Interactive Screen:** Define what sanctions and embargoes are and what they are used for. Checking the lists and what to do when a positive match is identified.
2. **Scenario:** Taking the correct action when presented with a high-risk transaction.
3. **Key Learning:** It's important to know your client and know what countries you can deal with. If in any doubt, check the sanction blacklist.
4. **Scenario:** Client has opened an office in a country on the sanctions list and is transferring large sums of money into an account in the country.
5. **Key Learning:** Companies have a legal obligation to comply with sanctions and embargoes.
6. **Assessment:** Five-question quiz on the content presented in this topic.

Topic 4 – Speaking Up

1. Summary screen that wraps up the module and provides details of where to go to speak up.
2. Attestation screen where learners attest that they will always adhere to our policies on trade compliance.