

## TRADE CONTROLS TRAINING

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##### 1.0 PURPOSE

Training is a critical component of any compliance program that provides employees and others with information to prevent and detect violations of law or company policy.

##### 2.0 REQUIREMENTS

##### 2.1 Mandatory Training

Training should be conducted in accordance with the schedule below.

##### 2.2 Parties to be Trained (includes but not limited to)

- New employees
- Senior executives
- Program managers
- Trade control specialists
- Empowered officials
- Employees with classification responsibility
- Employees with screening responsibility
- Other employees with functions directly related to trade controls
- All other employees with internet access
- Distributors and other resellers (Optional)

##### 2.3 Training Responsibilities

Businesses shall have a procedure for training incorporating the following elements:

2.3.1 Live “in person” training should be offered when possible and practicable. Live web-based training is an acceptable alternative, especially for focused training on specific topics.

2.3.2 On-line training should be used when either live “in person” or live “web-based” training is impracticable. On-line training modules should be reviewed and updated at least bi-annually.

2.3.3 Outside experts (including outside counsel) should be used for training when internal resources are inadequate.

2.3.4 Mandatory training must be offered in local language.

2.3.5 Records must be maintained indicating (a) person trained, (b) subject of training, (c) date of training, and (d) format, e.g., live, web-based, on-line.

##### 2.4 Training Procedure

Training shall be performed in accordance with the following table.

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(This table is meant to be a guide only.)

<b>Party to be Trained</b>	<b>Training</b>	<b>Frequency</b>
New employees	<ul style="list-style-type: none"> <li>• Basic awareness including consequences of noncompliance, issue spotting and who to contact.</li> </ul>	Within 30-60 days of hire
Senior Executives	<ul style="list-style-type: none"> <li>• Basic awareness including consequences of noncompliance</li> <li>• Implementation and effectiveness of international trade compliance program</li> </ul>	At least biennially.
Program Managers	<ul style="list-style-type: none"> <li>• Basic awareness including consequences of noncompliance, issue spotting and who to contact.</li> <li>• Determining need and process for obtaining export/import authorizations.</li> </ul>	Upon appointment as Program Manager and at least biennially thereafter.
Trade control specialists	<ul style="list-style-type: none"> <li>• Tailored for function.</li> </ul>	At least annually.
Empowered officials	<ul style="list-style-type: none"> <li>• Understanding of the provisions and requirements of the various export control statutes and regulations, and the criminal liability, civil liability and administrative penalties for violating the Arms Export Control Act and the International Traffic in Arms Regulations.</li> </ul>	Basic training before appointment as empowered official; ongoing training annually.
Employees with classification responsibility	<ul style="list-style-type: none"> <li>• Basic awareness including consequences of noncompliance.</li> <li>• How to classify, tailored to specific technologies at issue.</li> </ul>	Before assigned responsibility as “classifier;” refresher training at least biennially.
Employees with screening responsibility	<ul style="list-style-type: none"> <li>• Basic awareness including consequences of noncompliance.</li> <li>• How to screen, including how to clear false positives and how to address true positives.</li> </ul>	Before assigned responsibility for screening or provided access to automated screening tool; refresher training at least biennially.
Other employees with responsibility for trade controls	<ul style="list-style-type: none"> <li>• Basic awareness including consequences of noncompliance, issue spotting and who to contact.</li> <li>• Additional training tailored to responsibilities.</li> </ul>	As needed.

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All other employees with internet access	<ul style="list-style-type: none"><li>• Basic awareness including consequences of noncompliance, issue spotting and who to contact.</li></ul>	Annually.
Third parties (OPTIONAL)	<ul style="list-style-type: none"><li>• TBD by company</li></ul>	As appropriate

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