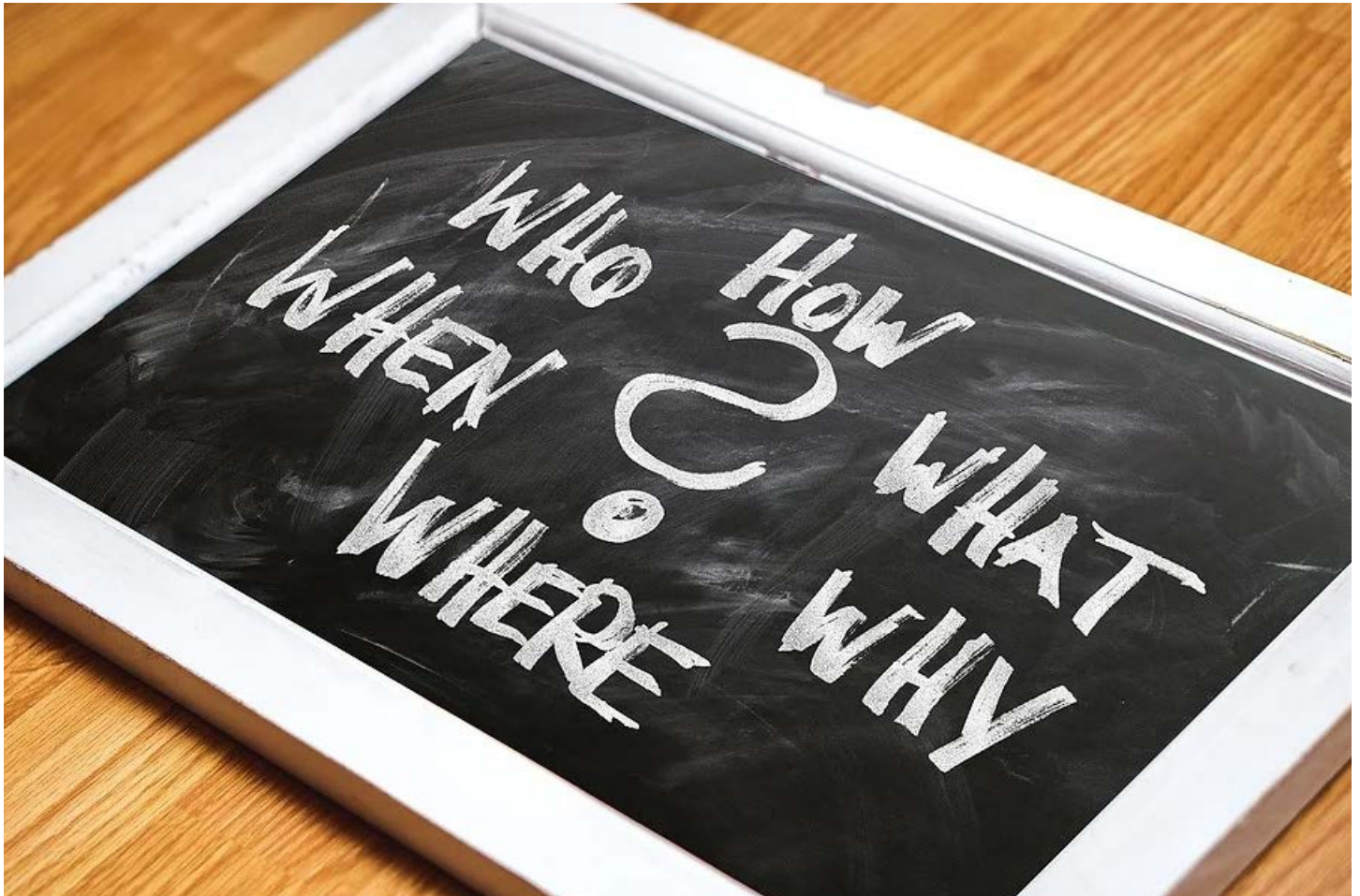




# ICP – The best way to comply with sanctions & restrictions

An Internal Compliance Program helps to master challenges due to always changing national and international sanctions and restrictions



Taking into consideration rapid scientific and technological advancements, the complexity of today's supply chains and the ever growing significance of nonState actors, effective trade controls depend to a great extent on the awareness of companies and their active efforts to comply with trade restrictions. To this end, companies usually put in place a set of internal policies and procedures, also known as an Internal Compliance Programme (ICP), to ensure compliance with international and national trade control laws and regulations. The scope and the extent of these policies and procedures are usually determined by the size and the commercial activities of the specific company.

In the field of sanctions and restrictions, your ICP should state and demonstrate that and how you:

- conduct (a) prohibited parties (for all parties to the transaction); (b) prohibited country destinations; and (c) prohibited end-uses;

- communicate export control classifications and destination information to end-users, consignees, freight forwarders and other parties to the transaction;
- use information technology to enhance your due diligence review;
- conduct training for foreign distributors, resellers and other intermediaries regarding the legal risks from unauthorized diversion;
- include a clause in your contract with the foreign purchaser that (a) provides that the customer will not re-export the product from the purchaser's country without obtaining the consent of the exporter, and (b) provides that the purchaser will indemnify the exporter from liability (including litigation costs) arising from unauthorized diversion;
- pay high attention to any red flag and communicate internally such red flags and the measures you have taken to deal with these issues.

RespectUs has extended experience in assisting companies to complete ICPs and obtain their validation by licensing authorities. We have a clear path and offer full transparency to our clients. During a first 1 hour introduction meeting (in presence or remotely), we would like to know your ICP scope, the size and structure of your company and the number of jurisdictions involved. Within 10 days, you will get a full consulting business proposal with a fix price. Once you have approved this proposal, we schedule the kick-off meeting. Within 90 days after kick-off, you will receive a full 10 chapter ICP.

Your journey to a successful ICP