



# Internal Compliance Program – Series (4) – How to set up an internal project team for the ICP process

Today, in the fourth article in the hands-on practical advice series on Internal Compliance Programs for Export Control:

## Part 4: How to set up an internal project team for the ICP process

You have read all do's and don'ts. You have possibly hired an external consultant to assist you with the set up of the Internal Compliance Program. What else do you have to consider? Yes, obtaining green light from the Management and dedicate internal resources to accompany the ICP process.

### **Obtain green light from the Management.**

The Management has not only to foster a compliance culture throughout the company and commit to the ICP process (more on that topic in the next article). The Management's support is essential in ensuring that the Internal Compliance Program receives adequate resources and is fully integrated into the company's daily operations. To obtain such support, you should submit a project plan, with a clear definition of the timeline (ask your external consultant, if you have hire done, to draft this one), the different milestones, the cost (for external consultants if any) and, most importantly, the internal resources you want to have allocate to the project. For the milestones, you could base your proposal on the 10 chapters of the ICP according to the Luxembourg guidelines of February 2020, each of them being a sub-project.

### **Dedicate sufficient internal resources to the ICP process.**

You will need a project team to accompany the ICP process, which at least will take 3 months (or more, depending on the company's risk level) of heavy work. Headed by a dedicated project manager, this team should be composed according to the structure of your company. It is recommended to have on board employees from Export Control (or overall) Compliance (if any in the company), from Legal, from Product Management, from Sales, from Customer Relations, from IT, from Audit, from HR. All these must not be permanent members of the team and assist to all meetings and workshops. A good business practice is to have a small team following the project on a daily basis and to invite the concerned departments and employees to the meetings if topics on the agenda are relevant for them.

Start also by raising awareness throughout the different departments, by inviting them before hand to a presentation of the ICP project, the timeline and, above all, the purpose of doing this.

