



Internal Compliance Program – Series (9)– Showing your business activity

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

Part 9: Risk Assessment – Company Profile – Showing your business activity

You have started the Risk Assessment chapter. Your company profile has been explained. Now, moving on to show your business activity is recommended.

Regulators like to be updated on your business activity. Make them that favour and tell them if your company is a manufacturer, a reseller, a distributor, an integrator, a provider of technical assistance or technology transfer, or a broker. Present the part of turnover (based on latest audited annual accounts) originating in each of these activities, and product categories.

In what industry sector are you working? Is there a major compliance risk for this industry? For what reasons? Do you have knowledge of any violations of export control compliance regulations by competitors, and the reasons for these violations?

Who are your main competitors for each of the products and activities? What is your market share in the different territories? What is the market size for your products and activities?

What is your products portfolio history? Some words about innovation and research & development activities? Public funding received?

What are the types of customers you are serving? Public authorities or entities, Government, defence companies, private companies, individuals? Do you pass by intermediaries, like resellers, distributors, integrators?

How are our products sold? Under your corporate brand, co-branded or with a private label?

Does your company perform field services?

How many orders are you processing monthly?

Are you inviting overseas entities to send representatives to your facilities for periodic training, or for product updates or enhancements you are hoping to market?

Some tips: Try to be as exhaustive as possible in this chapter. Produce graphs and pictures of your activity. Do not limit your developments to products or activities that are export controlled. This could give an incorrect view of your overall risk exposure. Be as well as neutral as possible, as regards competitors.

