



Federal Office  
of Economics  
and Export Control  
BAFA

# German ICP Concept

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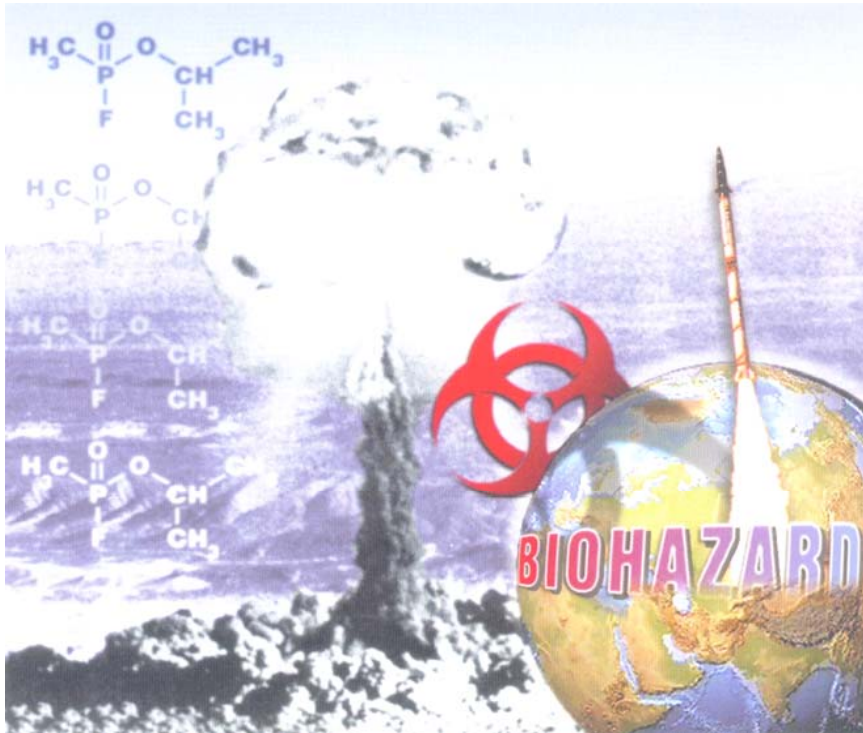
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## Agenda

- I. Internal Export Controls - what for?**
- II. Legal Framework in Germany**
- III. Best Practice Recommendations**

## I. Internal Export Controls - what for?

# Export controls: responsibilities for all



Effective export controls start inside the exporting company

## Why companies are doing it

- Obey the law
  - national and international laws
  - possible sanctions
- Good reputation
  - scandals kill business

## Why companies are doing it

- Moral responsibility / political self-interest
- Efficient application to minimise time and effort

### **The person responsible for exports**

- a matter for the top management

## An ICP Concept

- recommendations only
- directed at small and medium sized companies

## Create a culture of compliance

The management needs to create awareness

- that internal export controls are necessary and worthwhile (published commitment to compliance by Chairman/CEO)
- what goals export control has

## Organisational aspects

### **Integration of export controls in company workflow, i.e. central internal export control division**

- needs authority
- needs to have power to stop any deliveries
- working with the person responsible for exports
- communication

## Organisational aspects

### **Define control procedures**

- at the earliest time possible
- IT support
- workflow / instructions
- documentation

### Organisational aspects

#### Tasks of the export control division

- pre-application:
  - classify goods, technology, software
  - apply if necessary
- post-application:
  - comply with conditions and requirements
  - last check before shipping
- in case of denial

## Personnel selection

### **Selection of responsible personnel and determining of competence**

- expertise requirements
- personal requirements

## Permanent training

### **further training of employees**

- regular training
- provide up-to date working materials

# Supervision

## **Supervise compliance**

- random, system and routine checks
- criteria
- documentation

## Any questions?

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**Thanks for your kind attention!**