



INTERNATIONAL TRADE COMPLIANCE PROGRAM at GE

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The organization structure - ITC COE



ITC COE works for the GE businesses to make international trade compliance simpler.

Provide guidance, advice and expert solutions, and information about the governments' export control laws and regulations.

ITC focal network

Serve as site's primary point of contact for export control matters

Disseminate Corporate ITC alerts and updates to local site employees

Resolve less complex local site's export control matters

Participate in relevant ITC training and seminars



GE export control compliance program

THE SPIRIT

3 Key Questions

To Ask Whenever You Are Unsure

01

How would this decision look to others?

02

Am I willing to be held accountable for this decision?

03

Is this consistent with GE's Code of Conduct?

Remember:
Act if you see an issue.
Ask if you're not sure.



See more online at:
integrity.ge.com



THE
SPIRIT &
THE
LETTER
simple reference

 integrity.ge.com

INTERNATIONAL TRADE COMPLIANCE (ITC)

Key Policy Requirements

- Commitment to compliance with all applicable international trade compliance laws
- Each GE business is required to implement an export compliance program



GE export control compliance program

Company-wide Export Controls Enterprise Standard

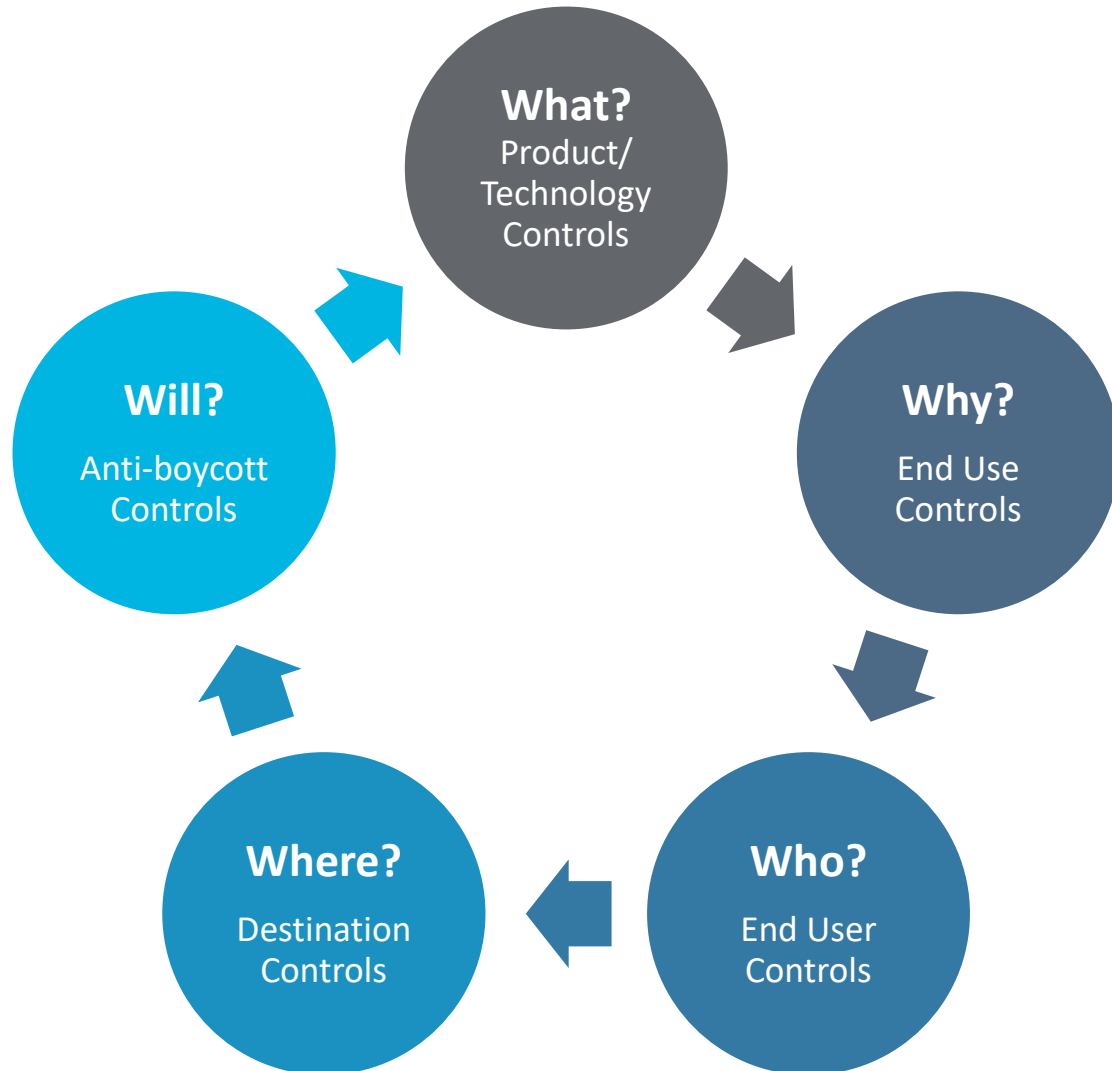


- ✓ Primary authority on the establishment and management of GE's internal export compliance program
- ✓ Ensures proper export decisions are made consistently, and that responsibilities are clear
- ✓ Minimizes the risks of non-compliance

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- INFRASTRUCTURE
 - MANAGING KEY RISKS
 - EXPORT LICENSING
 - EXPORT MONITORING

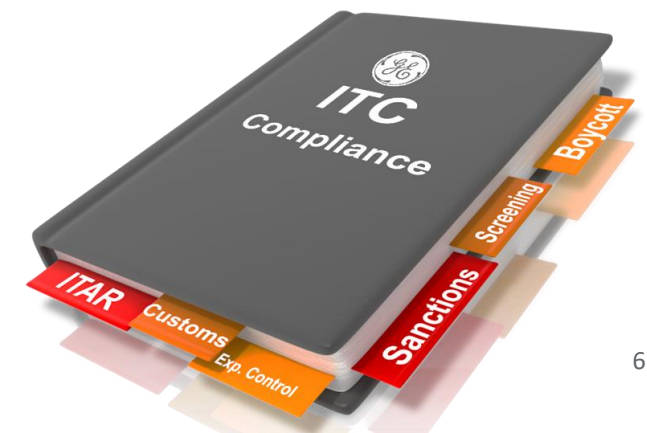


Program focus: **The 5Ws**



GE's Export Profile

- High-tech products
- Distributor model
- Military items & customers
- Global sales



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1 **WHAT** is being exported?

Product / Technology

Controls: Is the item dual use, or specially-designed or modified for military / defense use?

- **Classifying / Tagging** the item under the proper export classification is the baseline for export control compliance!
- Export classifications are set by our **engineering team** or their designees.
- Export classification determines the **rules of the road** for export purposes.
- Even low-tech, older products or technology may be controlled.



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CLASSIFICATION key takeaways

Classify all products, software and technology

Require suppliers to provide ECN or product information

Submit request to ETRB/Gov't to classify items and technology



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2 WHY is the end user seeking the item?

End Use Controls: Will the item be used in a way that poses national security concerns?

- **Catch-all controls.** End use activities related to chemical, biological or nuclear weapons, even if items are not listed in control list.
- **US China Military Rule.** Certain dual-use products cannot be sold for military end use in some countries.
- **Risks of diversion.**

PERFORM DUE DILIGENCE. REVIEW RED FLAGS.



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The vast majority of activities are legitimate. However there are those who attempt to purchase or divert controlled goods and technologies to WMD or military programs of concern.



ALERT!

If you find yourself in any of these situations, you may be dealing with an illegal strategic goods transaction.

- *You are approached by a customer whose identity is not clear.*
- *The consignee of end-user is found on designated lists.*
- *The customer is reluctant to provide end-use or end-user information.*
- *The product's capabilities do not fit the buyer's line of business.*
- *The customer declined routine installation, training or maintenance services.*
- *More, click [here](#).*



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CATCH-ALL CONTROLS key takeaways

Secure signed end user statements or affidavits

Perform due diligence

Review all red or warning flags



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3 WHO will be receiving the export?



End User Controls: Does the person or entity who will receive the item pose national security concerns?

- Is this an end user that GE is familiar with?
- Is the end user involved in any military or WMD activities?
- **We must screen all known parties to a transaction**



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Which lists do we screen against?



BIS List: Denied Persons List, Entity List, Unverified List



EU Consolidated List



Interpol



METI (Japan)



MAS (Singapore)



OFAC Specially Designated Nationals



UN Consolidated List



FBI Most Wanted



Customer Connect

LexisNexis®
Bridger Insight™ XG
Client Login

Client ID

User ID

Password

[Forgot Password?](#) [Login](#) [Exit](#)

The LexisNexis® Bridger Insight™ XG services are not provided by "consumer reporting agencies," as that term is defined in the Fair Credit Reporting Act (15 U.S.C. § 1681, et seq.) ("FCRA") and do not constitute "consumer reports" as that term is defined in the FCRA. Accordingly, the LexisNexis® Bridger Insight™ XG service may not be used in whole or in part as a factor in determining eligibility for credit, insurance, employment or another purpose in connection with which a consumer report may be used under the FCRA.



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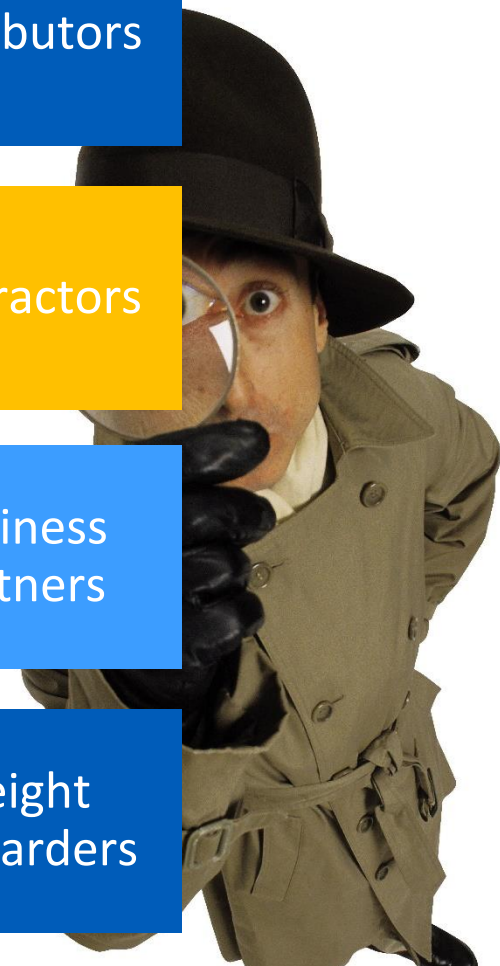
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These are a sample of the baseline lists

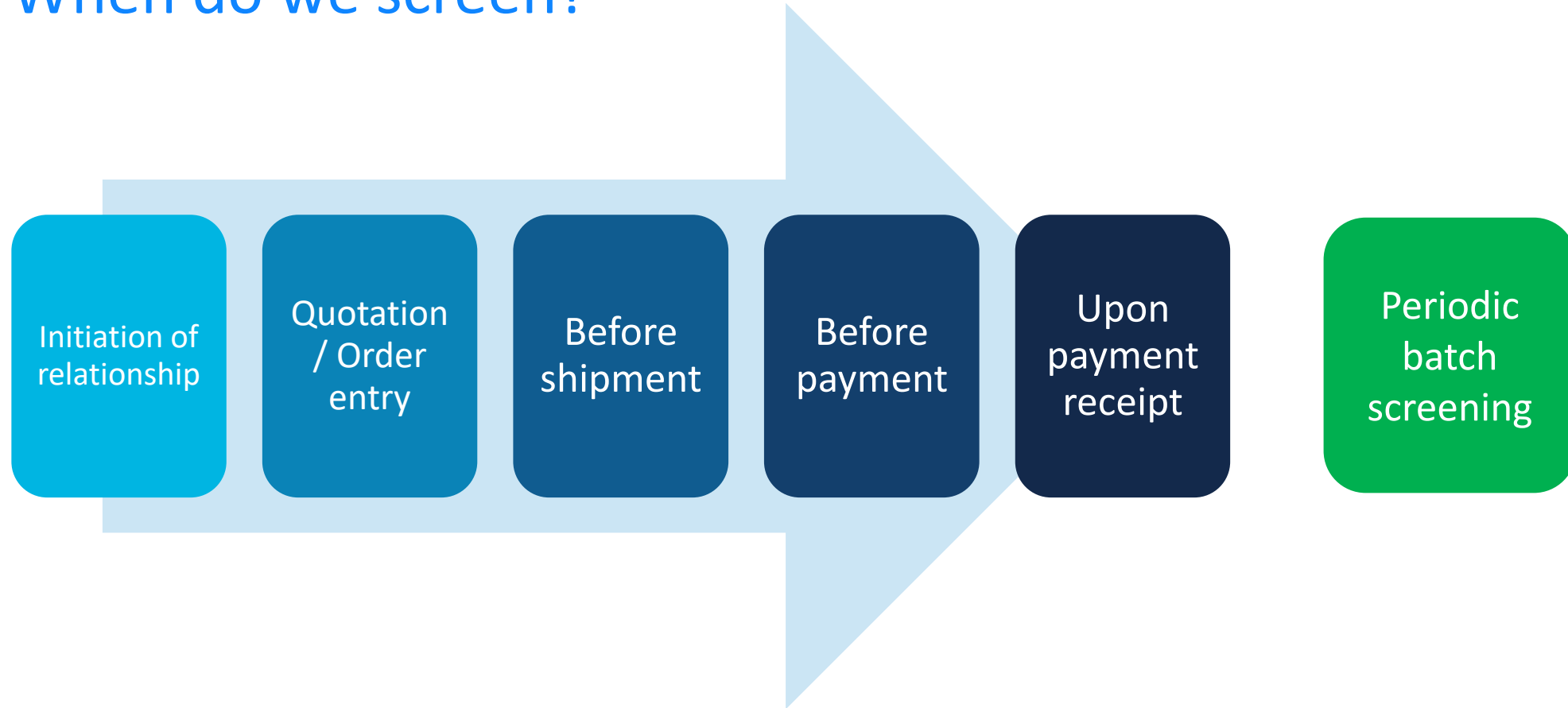
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Who do we screen?



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When do we screen?



Timing of screening is critical



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SCREENING key takeaways

☑ Screen all known parties to the transaction

☑ Timing of screening is critical, conduct re-screening when necessary

☑ Use an automated screening tool



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4 **WHERE** is the item being exported?

Destination Controls: Is the product destined for a country that poses national security concerns?

- U.S. **embargo and sanctions** programs. GE State Sponsor of Terrorism **Policy** prohibits business by any GE entity with Iran, Syria, Cuba and North Korea unless authorized by a US Government license
- Policy applies to all entities (US and non US) owned or controlled by GE
- Policy applies to direct and indirect transactions
- Potential diversion / re-export to an embargoed country. Higher risk when selling to **certain countries and regions!**



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SANCTIONS REVIEW key takeaways

Check if US jurisdiction applies

Review sanctions regulations

Perform due diligence



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5 **WILL** the export violate the U.S. anti-boycott laws?

Anti-boycott Controls: Do the terms of the transaction support a boycott that violates U.S.' foreign policy objectives?

- Arab Boycott of Israel, Pakistan & India
- GE Centralized review and clearance



We cannot proceed with any transaction containing potential boycott language until it has been reviewed by Legal!



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Recognizing a boycott request

Sample Boycott-related Language

No import shall be permissible from **Israel** or of goods originating from **Israel**

The SELLER shall declare that the GOODS delivered are not supplied nor manufactured by either a company or one of the subsidiaries/ branches who are **blacklisted by the Arab Boycott of Israel**. The GOODS shall not contain any components of Israeli origin

The carrying vessel may not be an **Israeli flag**

All potential boycott language must be reported through the Support Central Boycott Workflow, click [HERE](#) to access the workflow.



ITC COE website - One place to get help across all of GE!



The screenshot shows the homepage of the International Trade Compliance Center of Excellence (ITC COE). At the top left is the GE logo. The main header reads "International Trade Compliance Center of Excellence" with a sub-header: "The ITC CoE works for you to make international trade compliance simpler. Through responsive and expert guidance, we provide GE businesses practical solutions that enable growth." On the top right is a globe icon with "GE ITC COE" text. Below the header is a navigation menu with three items: "ITC Basics" (blue background), "Training & Meeting Materials" (green background), and "Raise an ITC Question or Concern" (grey background). The main content area features the text "ITC COE Website" and a blue link "[Click here!](#)". The background of the main content area is a blue-toned image of a train with various data charts and graphs overlaid on it. At the bottom right of the image are four small circular navigation dots, with the second one from the left being highlighted in green.

International Trade Compliance Center of Excellence
The ITC CoE works for you to make international trade compliance simpler.
Through responsive and expert guidance, we provide GE businesses practical solutions that enable growth.

ITC Basics

Training & Meeting Materials

Raise an ITC Question or Concern

ITC COE Website
[Click here!](#)



Training materials



ITC CoE Training Materials

Please select from the following:

- [ITC CoE Training Materials Repository](#)
Note: Google Chrome is required. ¹
- [ITC CoE Training \(Summary Course Sheet\)](#)

references:
1. *If you do not have Google Chrome, you may download it from GE's MyTech site.*
Link: <https://ge.service-now.com/mytech/>



ITC CoE Monthly Compliance Moment

Please select your language from the following Jan 2016 documents:
Topic: **Remember to ask the 5 W's**

[Chinese](#) | [German](#) | [English](#) | [French](#) | [Spanish](#)

Click [HERE](#) to access the training materials

- 1 Overview**
 - Introduction
 - Advanced fundamentals
- 2 Function Specific**
 - Engineering
 - Commercial
 - Logistics, etc.
- 3 Subject Specific**
 - Antiboycott
 - Sanctions
 - Watchlist screening
- 4 Other**
 - Business specific
 - Regional
 - External



Thank you !

ありがとうございます!

谢谢!

