



# Our Journey: Sustaining the Future with Compliance

*People, Knowledge & Tools*

Tay Seow Fong

Infineon Technologies Asia Pacific Pte Ltd

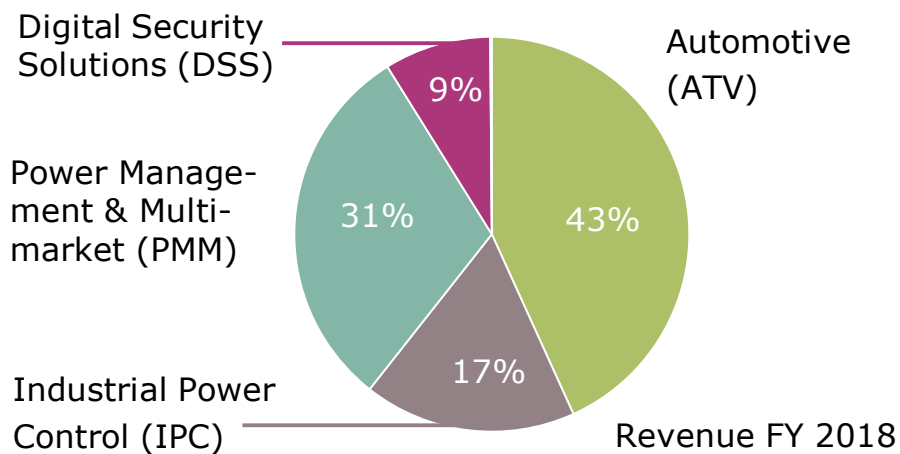


# Agenda

- 1 About Infineon Technologies
- 2 Export Control & Customs Global Directives
- 3 How do we comply
- 4 Our Aspiration

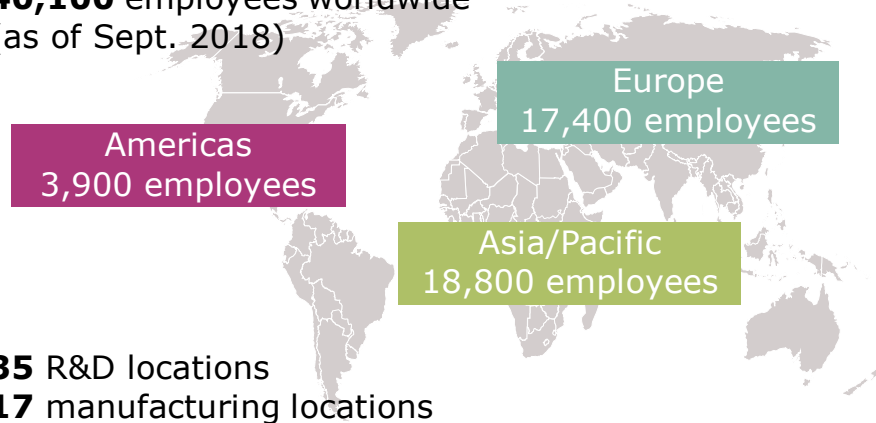
# Infineon at a glance

## Business Segments



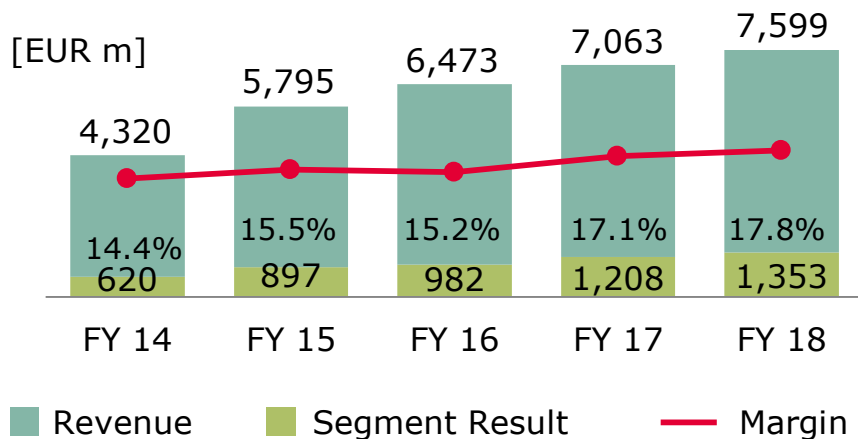
## Employees

**40,100** employees worldwide (as of Sept. 2018)



**35** R&D locations  
**17** manufacturing locations

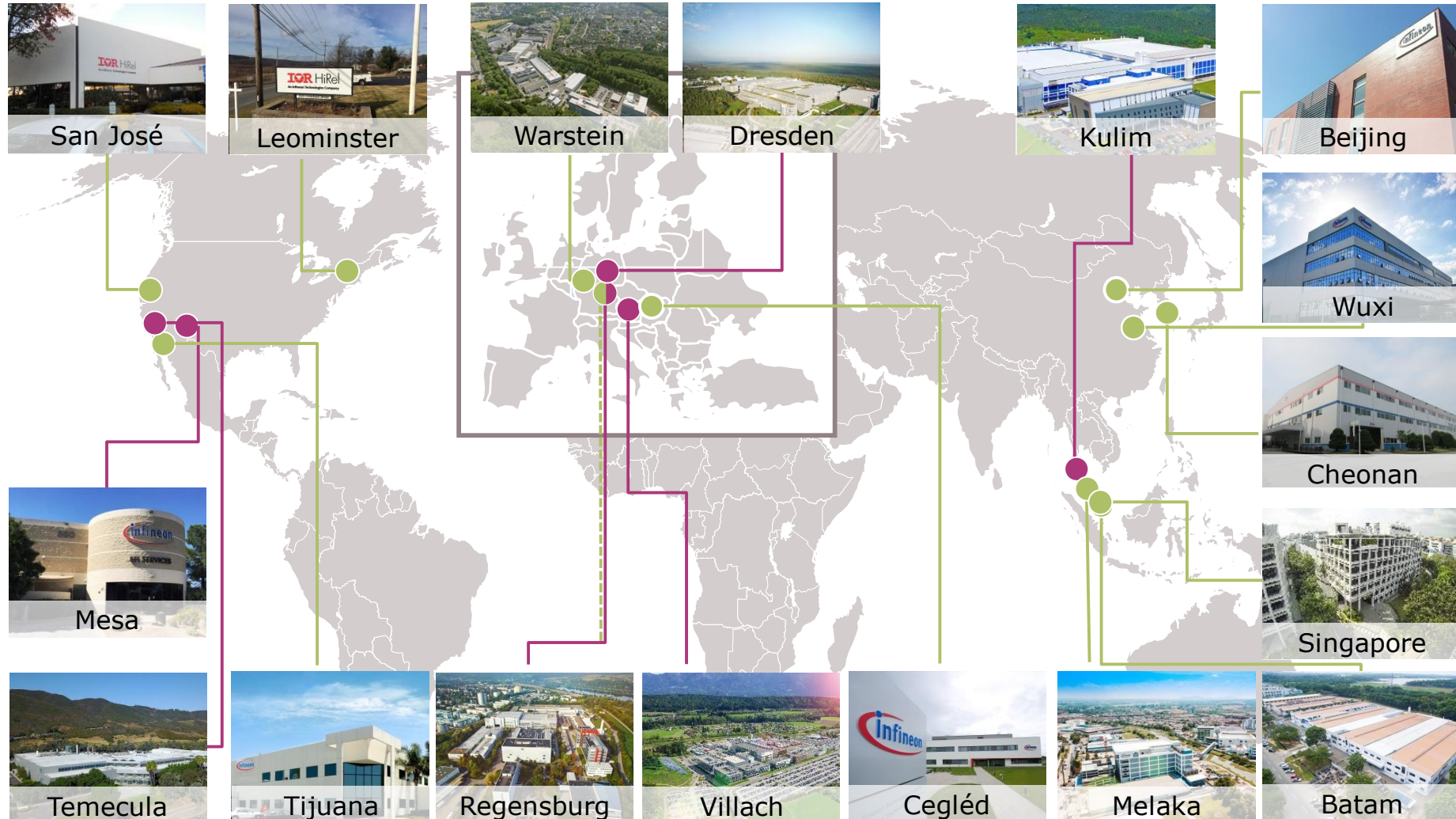
## Financials



## Market Position



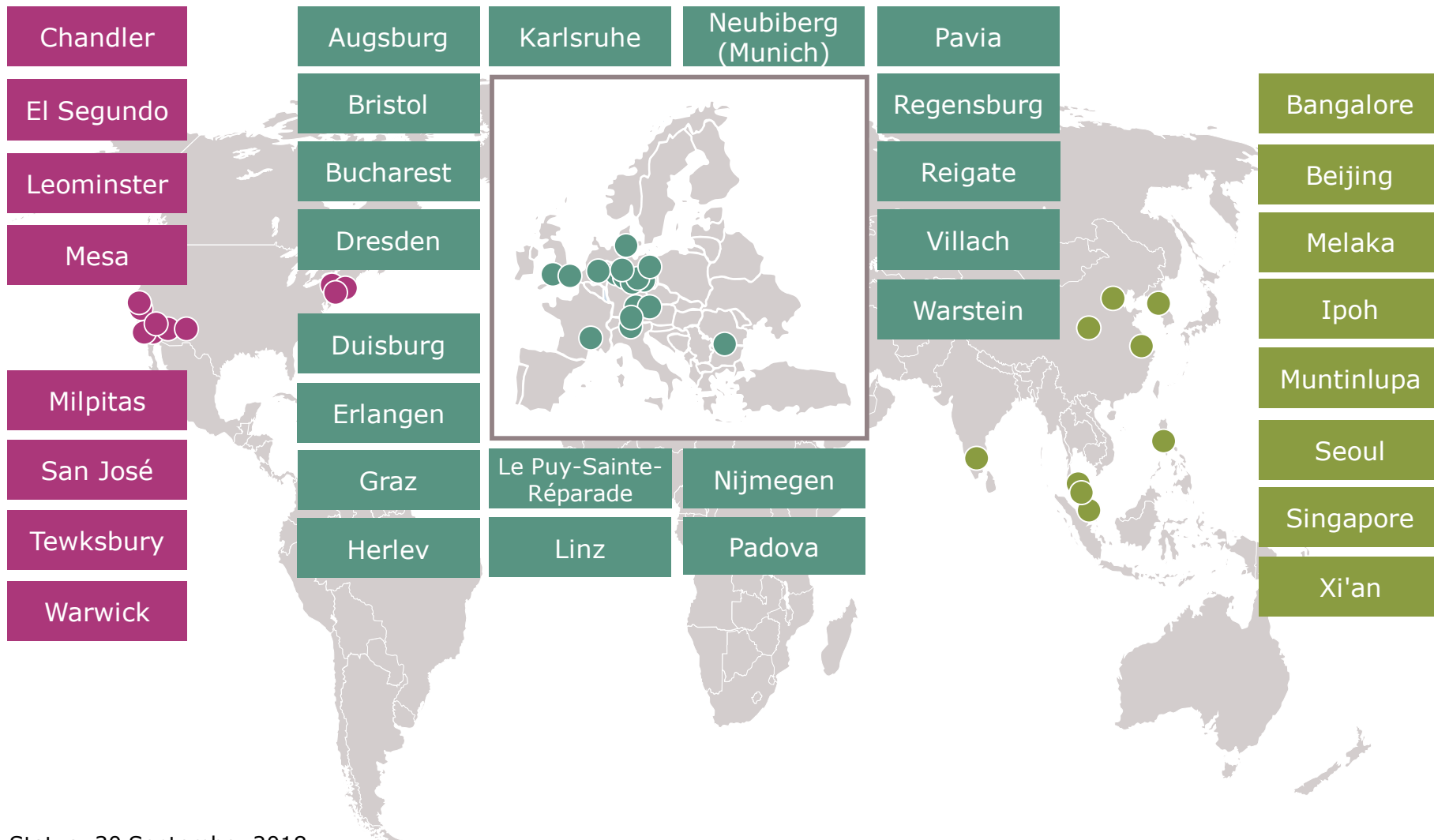
# Worldwide manufacturing sites frontend and backend



● Frontend ● Backend

Stand: 30. September 2018

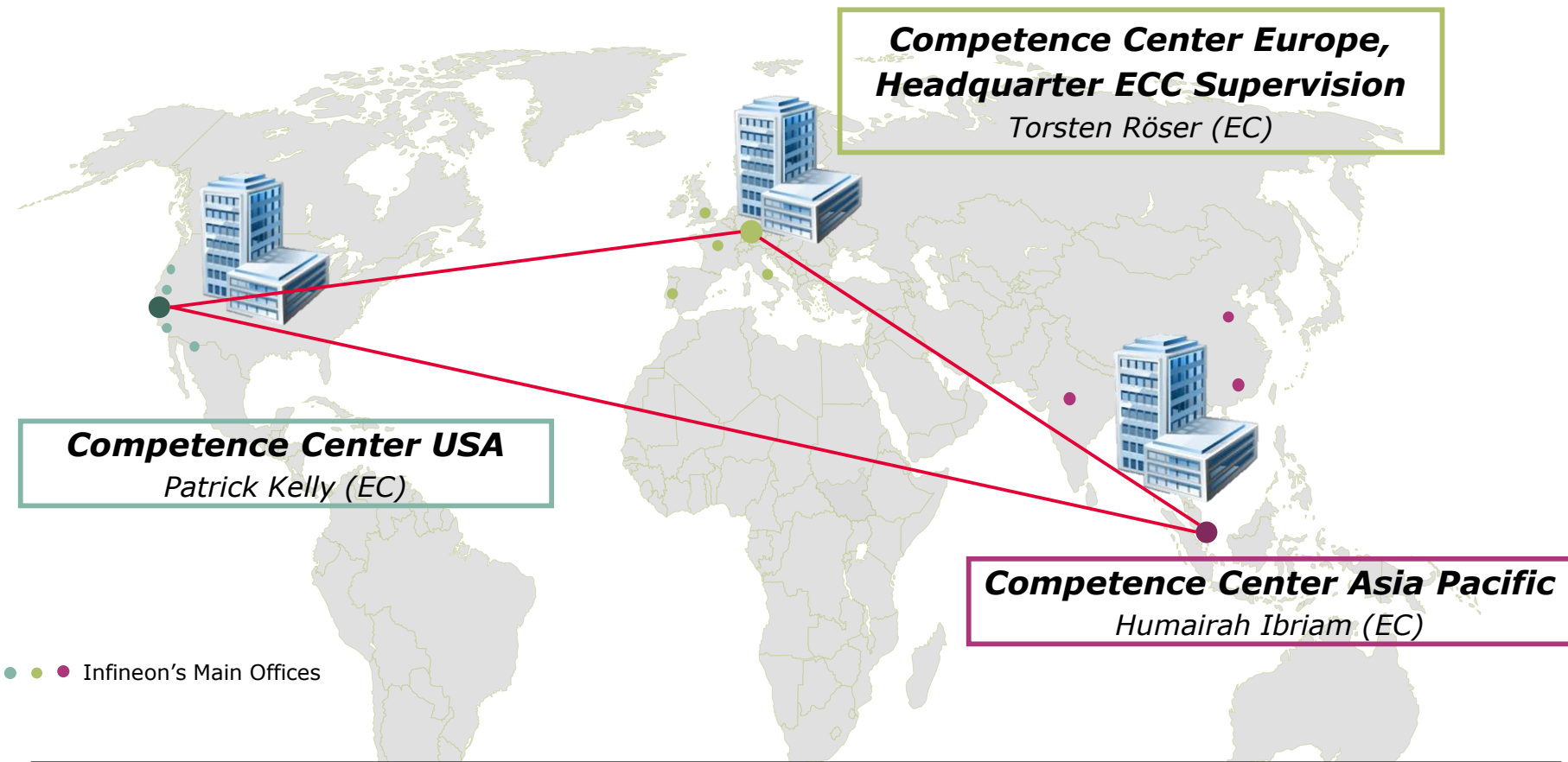
# Our global R&D network



Status: 30 September 2018



# Export Control Competence Centers



Competence Centers are responsible for the organization and supervision for all sites in their respective region. This covers ensuring the nomination of ECC-functions, audits, training and coordination of ECC-operations.

# Agenda

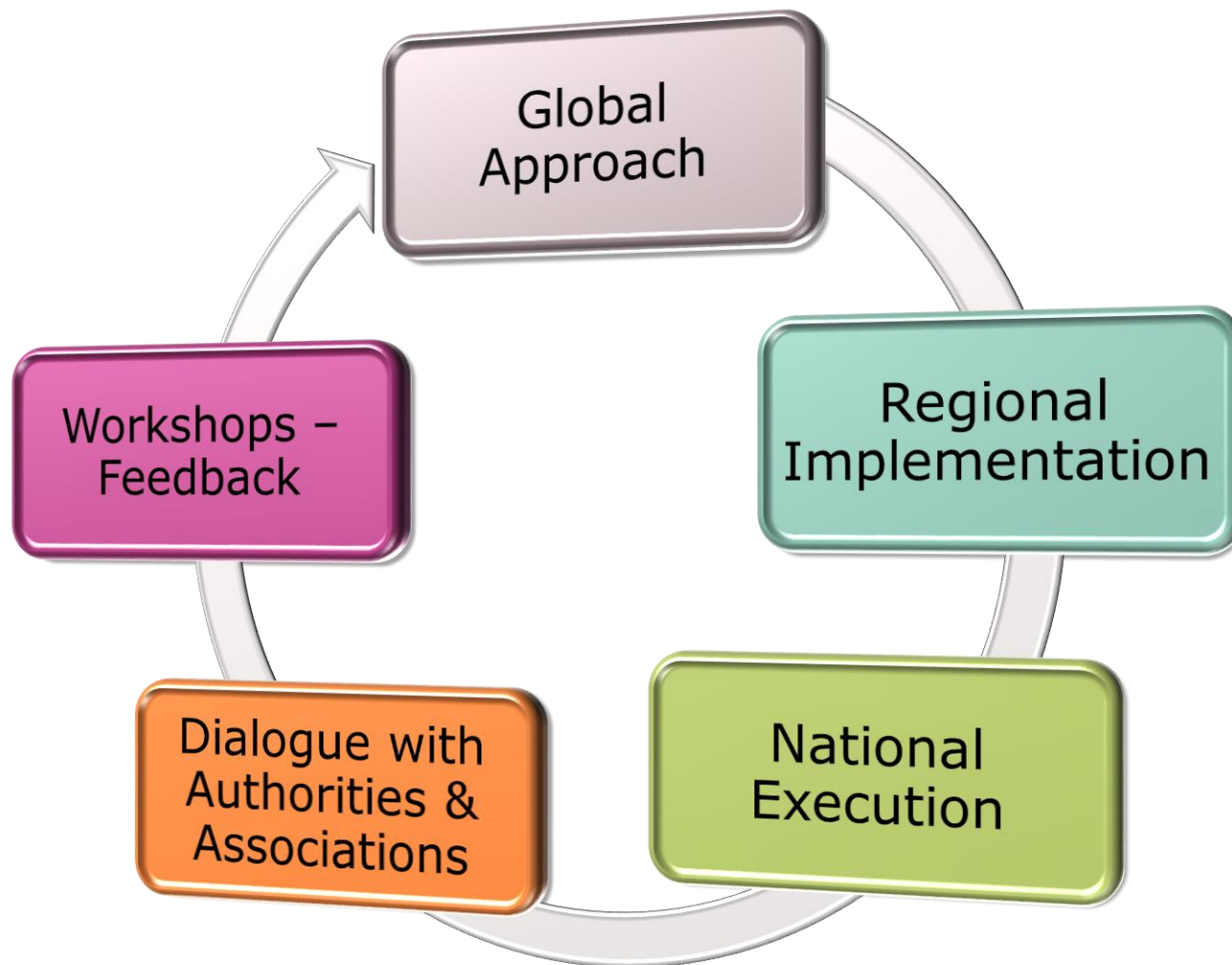
- 1 About Infineon Technologies
- 2 **Export Control & Customs Global Directives**
- 3 How do we comply
- 4 Our Aspiration



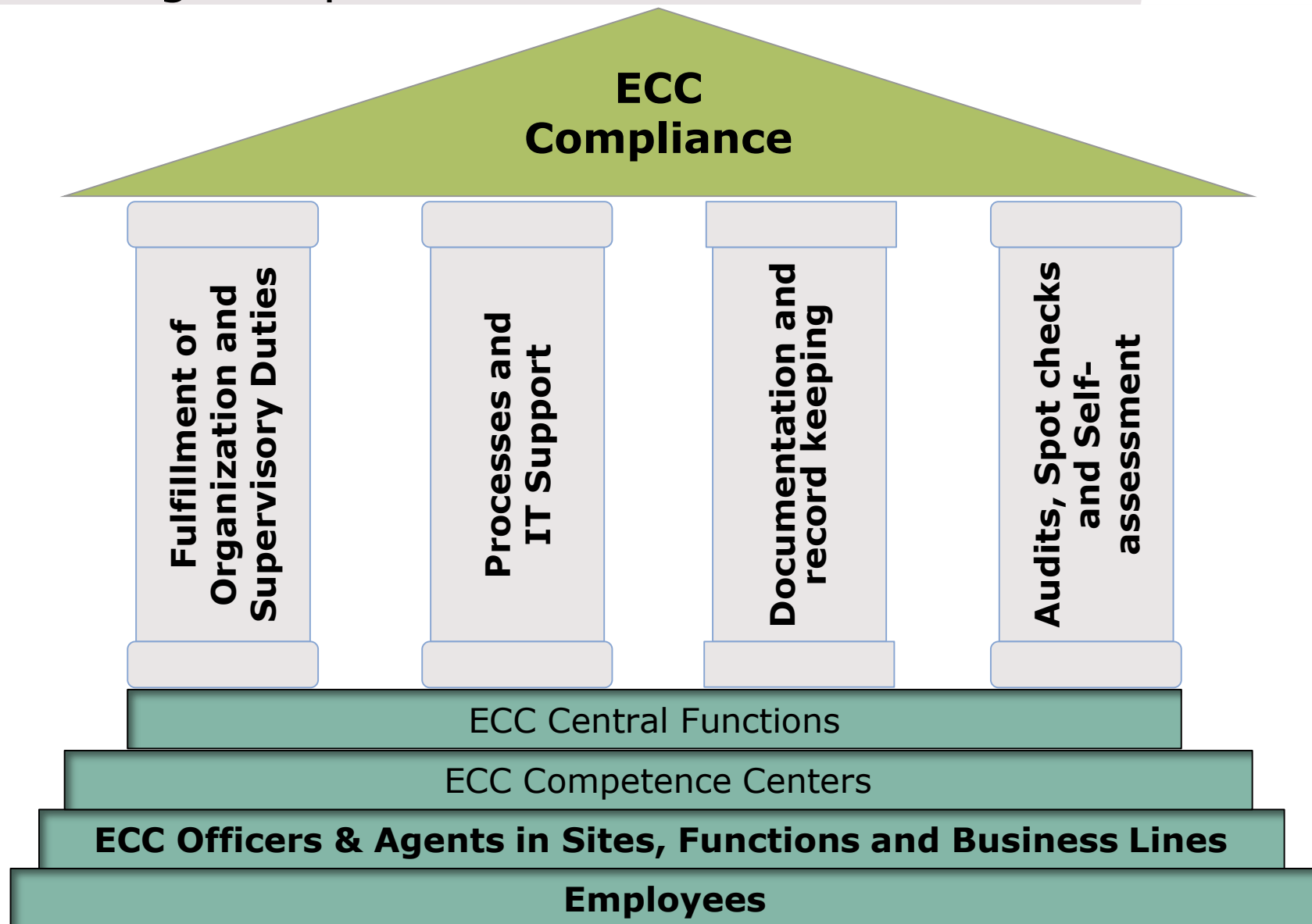
**To become a worldwide recognized and compliant partner in Export Control and Customs topics to enable and secure business**



# ECC Compliance Approach



# Achieving Compliance



# Agenda

- 1 About Infineon Technologies
- 2 Export Control & Customs Global Directives
- 3 **How do we comply**
- 4 Our Aspiration

# Our Responsibilities

- › Implementation of effective measures concerning export control regulations and foreign trade laws to avoid sanctions and penalties against Infineon Technologies

## People & Knowledge



## Tools



# Internal Compliance Program (ICP)







- › Expertise in all offices that we operate in:
  - Nominations of **Export Control Officer (ECO) & Customs Officer (CO)** for every site
  - Nominations of **Export Agents (EA)** for the various function groups
  
- › Close contact with the relevant authorities in the respective countries

**Infineon Technologies AG**  
IFAG BC EC  
Mr. Torsten Röser  
Am Campeon 1 - 12  
MUC/05.0.109  
85579 Neubiberg  
Germany

**Organizational and Supervisory Duties and Responsibilities –  
Internal Control Program for customs and export control and responsibility within the  
company**

Dear Sirs,

With respect to the global rule A.11 Export Control and Customs which governs the legal requirements concerning export control and customs, we herewith confirm the implementation of this rule and the related guidelines outlined in the supporting documents and ensure the compliance with the rules of conduct as indicated in Annex 1.

In this respect, Mrs. Humairah Ibram has been appointed as ECO (Export Control Officer) for Infineon Technologies Asia Pacific Pte Ltd (IFAP) and will perform the function of Export Control within the company. Ms. Tay Seow Fong has been appointed as the backup ECO.

In this respect, Mr. Tan Yew Poo has been appointed as CO (Customs Officer) for the Infineon Technologies Asia Pacific Pte Ltd (IFAP) and will perform the function of Customs within the company. Ms. Tina Tan has been appointed as the backup CO.

Place, Date

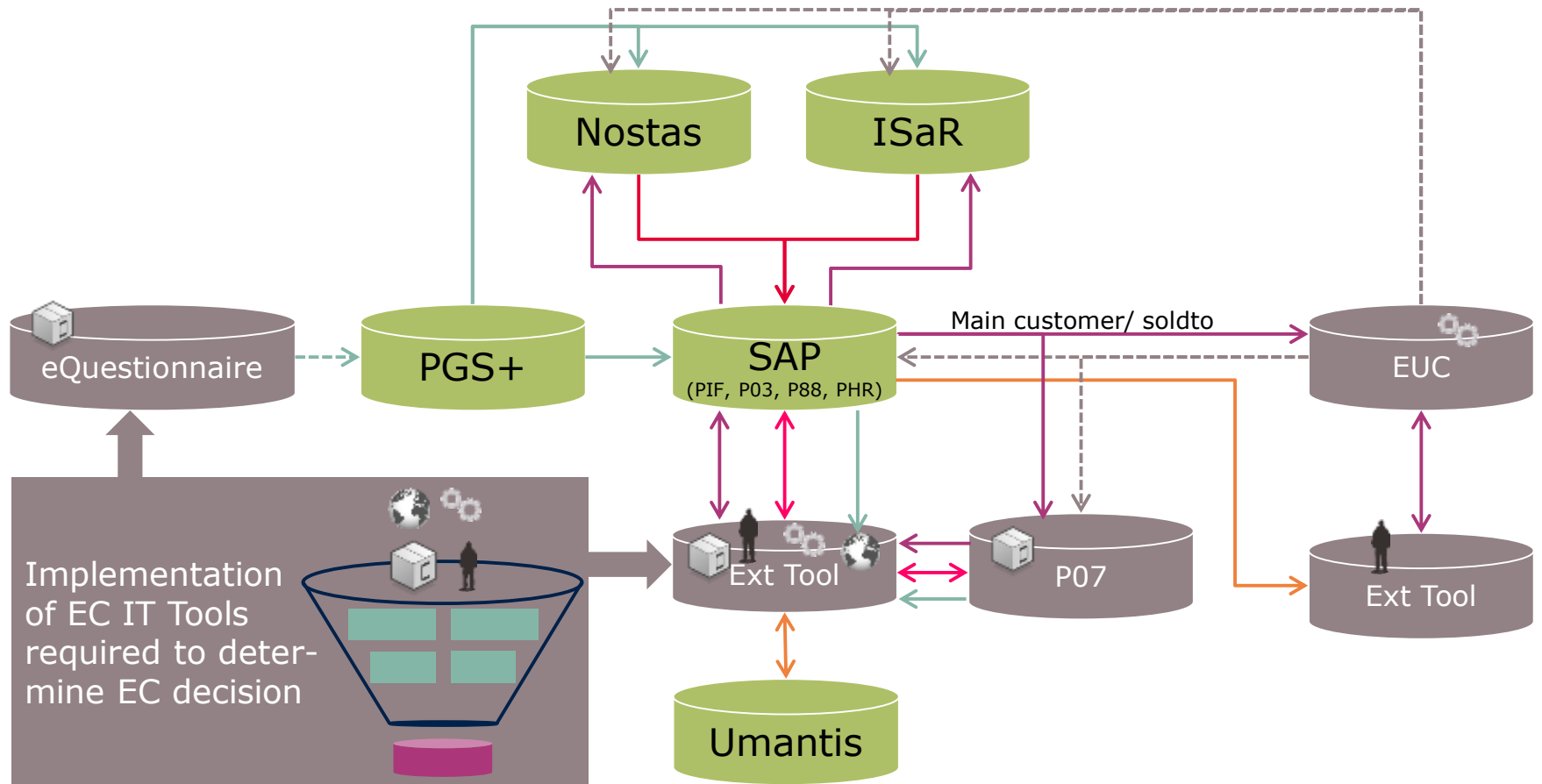
Singapore, 13 June 2017

Signature

Chong Yang Hsueh Andrew  
President and Managing Director  
Infineon Technologies Asia Pacific Pte Ltd

Attachment: Annex 1, Code of conduct for Export Control and Customs

# IT Landscape



# Product Screening - Standard Shipments

## > Master Data Suite - PGS+

	Baunumber	Serial no.	V-SNR	Sales Product	FP Number	SP Number	AL Number	ECCN	ECCN US	SI Class ▲	MY Class
	51024816	F0025	V66000M7616A31413Z...	SLM 76CF3201P VQFN8	MA000770324	SP000770086	5A002A1A4	N	5A002ENC2	5A002A1A	5A002A1A4
	51025205	F0026	V66000M7616A31513Z...	SLM 76CF3201P VQF...	MA000783606	SP000783286	5A002A1A4	N	5A002ENC2	5A002A1A	5A002A1A4
	51025259	F0001	V66000M7617A30613Z...	SLM 76CF2561P VQFN8	MA000785942	SP000785890	5A002A1A4	N	5A002ENC2	5A002A1A	5A002A1A4
	51025458	F0004	V66000M7615A30813Z...	SLM 76CF3601P VQF...	MA000790442	SP000785884	5A002A1A4	N	5A002ENC2	5A002A1A	5A002A1A4
	51025872	F0006	V66000M7615A30713Z...	SLM 76CF3601P VQF...	MA000802082	SP000802046	5A002A1A4	N	5A002ENC2	5A002A1A	5A002A1A4
	51025927	F0007	V66000M7615A30913Z...	SLM 76CF3601P C	MA000803602	SP000803402	5A002A1A4	N	5A002ENC2	5A002A1A	5A002A1A4
	51026300	F0027	V66000M7616A31313Z...	SLM 76CF3201P VQFN8	MA000824254	SP000823836	5A002A1A4	N	5A002ENC2	5A002A1A	5A002A1A4
	51026463	F0008	V66000M7615A30813Z...	SLM 76CF3601P C	MA000836412	SP000836166	5A002A1A4	N	5A002ENC2	5A002A1A	5A002A1A4

## > SAP

Sales: General/Plant Foreign trade export Sales text Purchasing Foreign trade import Purcha...

Material: MA001167758 SLM 76CF3601P C  
 Plant: WA00 DCAC - DHL Supply Chain

Country: SG Singapore

Foreign trade data

Comm./imp. code no.: 85423100 Digital integrated circuits  
 Export/import group: Z001 E/I Mat Group GOAL  
 CAS number (pharm.):  
 PRODCOM no.:  
 Control code:

Legal control

Act	LR	Exp. ctrl class	Grouping
<input type="checkbox"/>	DE	5A002A1A4	TC
<input type="checkbox"/>	MY	5A002A1A4	TC
<input checked="" type="checkbox"/>	SG	5A002A1A	TC
<input type="checkbox"/>	U1	5A002ENC2	TC
<input checked="" type="checkbox"/>	US	N	TC

# Product Screening - Non-Standard Shipments

CUSTOMER DETAILS		
Sold-To Details	Ship-To Details	End Customer Details
	WAY, ,Malaysia 47300,PETALING JAYA	

Product Details

	No	Description	Add. Descr./Info	Goods Type	Scope of Shipment	PL	FGR	Qty	Value	Currency	Goods Inventory	Copy	Delete
<a href="#">Select</a>	001	LAPTOP/NOTEBOOK, TABLET PC OR POCKET PC (WITH A WEIGHT OF 10 KG OR LESS)	Lenovo T410/xxxxxx	Material/Equipment (non-Fixed assets)/Spares		76	001	1 ST		EUR		<a href="#">Copy</a>	<a href="#">Delete</a>

PRODUCT DETAILS

Product Name	CoD	CoA	Product Number	HS Code
LAPTOP/NOTEBOOK, TABLET PC OR POCKET...			NO000152	84713020

Additional Product Details

Add. Product Desc	<input type="text" value="Lenovo T410"/>	Add. Product Info
Hazardous/Contaminated?	<input type="text" value="No"/>	CAS Number
Product Line (PL)	<input type="text" value="76"/>	FGR
Goods Location	<input type="text" value="Shipping department"/>	

Manual input; validated by the Export Control team

Export Control & Customs Classification Details

Country of Origin	<input type="text" value="CHINA (CN)"/>	HS CODE	<input type="text" value="84713020"/>
ALNR	<input type="text" value="N"/>	ECCN	<input type="text" value="4A994B"/>
SICLASS	<input type="text" value="N"/>	MYCLASS	<input type="text" value="N"/>
Local Classification	<input type="text"/>	<a href="#">EC Class Tools</a>	

Advice: You are able to attach evidence for product exportcontrol classification by using the 'Attach File' function below! This is helpful in case of external audits for those products where NO default values were provided by Nostas into ALNR, ECCN, etc. Click [here!](#)

# Product Screening - 3<sup>rd</sup> Party Products



## ECCN and HTS Information

### Page tools

[Print this page](#)

### Related links

[Compliance Information](#)

[Accessibility](#)

[Communication Devices](#)

[Electromagnetic Compatibility \(EMC\)](#)

[Export Control Classification Number \(ECCN\)](#)

[Harmonized Tariff Schedule \(HTS\)](#)

The following table summarizes the ECCN (Export Control Classification Number) and HTS (Harmonized Tariff Schedule) numbers for many Lenovo hardware products. If you have a question or need the numbers for products not listed below, please e-mail [compliance@lenovo.com](mailto:compliance@lenovo.com) for ECCN questions or [imports@lenovo.com](mailto:imports@lenovo.com) for HTS questions.

Product Type	Product Name	ECCN	HTS
Notebook	IdeaPad	4A994.b	8471300100
Notebook	Lenovo 3000	4A994.b	8471300100
Notebook	Lenovo	4A994.b	8471300100
Notebook	Lenovo Flex	4A994.b	8471300100
Notebook	Lenovo Essential	4A994.b	8471300100
Notebook	ThinkPad and ThinkPad Edge	4A994.b	8471300100
Notebook	ThinkPad Helix	4A994.b	8471300100
Notebook	ThinkPad Twist	4A994.b	8471300100

## EXPORT DECLARATION

Dear valued customer :

R2D Automation hereby confirms and declares that the following items:

10AE0153 – COMET SINGLE WAFER SORTER ROBOT 200MM 2 STATIONS

10AE0157 – COMET SORTER ROBOT – SINGLE WAFER 200MM OCR 2LPT

- 1)  are /  **are not** dual-use items and have no ECCN classification number
- 2)  are /  **are not** a “strategic item” controlled under Malaysian Strategic Trade Act 2010 (STA)
- 3)  are /  **are not** are controlled under Singapore/European export control regulations



# Product Screening – 3<sup>rd</sup> Party Products

From:  IFAP Export Control Sent: Mon 28/3/2016 2:54  
To:  Marcus Chng;  Tham Peng Kuan (IFAP OP BE TS SO UPS FTA)  
Cc:  IFAP Export Control;   
Subject: RE: (declaration of any US-origin components and/or technology)

Dear Marcus,

Thank you for your email. You have provided the ECCN EAR99 but indicated that there are no US components in the microscope and that the microscope are made in Japan. May I ask if the microscope was made with US technology? Or could you share how did you derive the ECCN EAR99 for the microscope.

Warm regards,  
Seow Fong

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**From:** Marcus Chng  
**Sent:** Monday, March 28, 2016 1:42 PM  
**To:** Tham Peng Kuan (IFAP OP BE TS SO UPS FTA)  
**Cc:** IFAP Export Control; 'Or Kok Ann'  
**Subject:** RE: (declaration of any US-origin components and/or technology)

Hi Tham,

It is confirmed that the microscopes are made in Japan and there are no components from USA. Therefore the ECCN number is EAR99. Thanks.

Best regards,  
Marcus Chng



# EUC Tool

## Questions and Answers

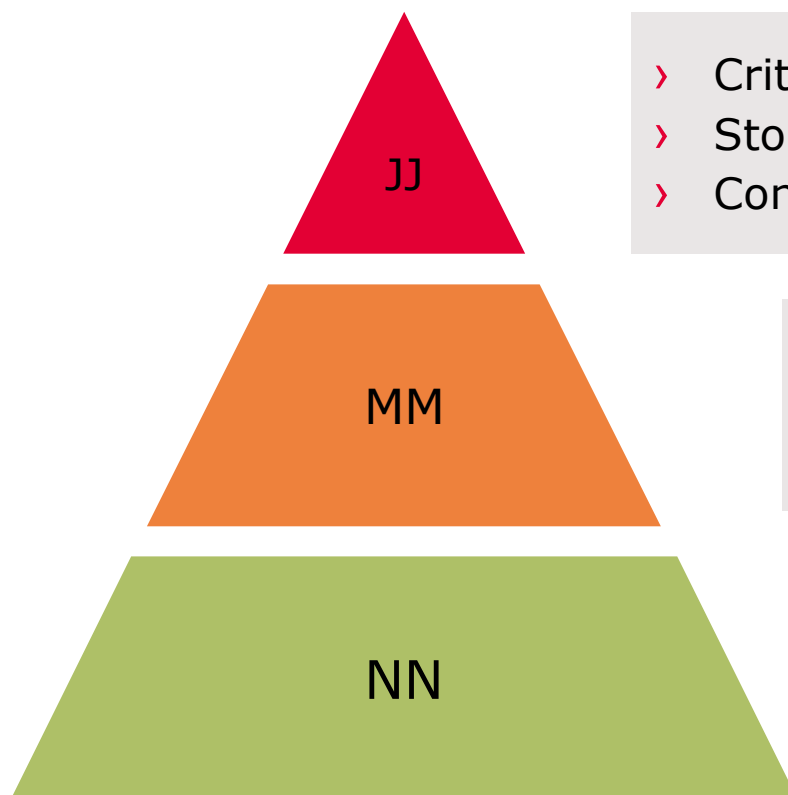
No.	Question	Answer
7	<p>Are any of the following points unusual for the business concerned?</p> <ul style="list-style-type: none"> <li>- Are there unusual payment terms or financing arrangements?</li> <li>- Are the order placing methods for the stated business unusual?</li> <li>- Is the order volume, packaging or shipping route unusual</li> <li>- contact only via post office box or mobile phone number</li> </ul> <p>Sind die folgende Punkte für das angegebene Geschäft ungewöhnlich?</p> <ul style="list-style-type: none"> <li>- gewünschte Zahlungsbedingungen oder Zahlungswege</li> <li>- Auftragsumfang oder - vergabepraktiken</li> <li>- Auftragsvolumen, Verpackung oder Lieferweg</li> <li>- Kontakt ausschließlich über Postfach oder Mobilnummer</li> </ul>	No
10	<p>Is a freight forwarder / broker designated as consignee?</p> <p>Ist der Empfänger ein Spediteur oder Broker?</p>	No
11	<p>Is the supply of goods intended for a customs free zone / free warehouse as ultimate destination outside the European Union?</p> <p>Ist das endgültige Bestimmungsziel unserer Kenntnis nach in einer Freizone / Freilager außerhalb der Europäischen Union?</p>	No
12	<p>Is there any knowledge that the purchaser, recipient or enduser is the military, paramilitary, police, government intelligence or the civil administrative agencies that work for the mentioned bodies?</p> <p>Haben Sie positive Kenntnis, dass Käufer, Empfänger oder Endverwender das Militär, Paramilitär, Polizei, Nachrichtendienst oder eine Verwaltung im Zusammenhang mit den genannten Institutionen ist?</p>	No
15	<p>Will the goods or the technical assistance be used in any of the following connections:</p> <ol style="list-style-type: none"> <li>1. Nuclear end use</li> <li>2. NBC weapons, launch vehicle technology or unmanned aerial vehicles</li> <li>3. Breaches of human rights, democratic principles or freedom of expression</li> <li>4. Interception or investigation of electronic communication</li> </ol> <p>Werden Güter oder technische Unterstützung in irgendeinem der folgenden Zusammenhänge verwendet?</p> <ol style="list-style-type: none"> <li>1. Kerntechnische Verwendung</li> <li>2. ABC-Waffen, Trägertechnologie oder unbemannte Flugkörper</li> <li>3. Verstößen gegen die Menschenrechte, Grundsätze der Demokratie oder Meinungsfreiheit</li> <li>4. Überwachung oder Unterbindung von elektronischer Kommunikation</li> </ol>	No
16	<p>Will the goods or the technical assistance be used in any of the following connections?</p> <p>Arms related goods, weapons, munition or armaments program</p> <p>Werden Güter oder technische Unterstützung in irgendeinem der folgenden Zusammenhänge verwendet?</p> <p>Rüstungsmaterial, Waffen, Munition oder das Rüstungsprogramm</p>	No



Identify potential red flags in a transaction.

If red flags are identified, a response will be triggered to the site Export Control Approver(s)

# Overview of AWV codes



- > Critical business / sanctioned party involved
- > Stop any further business
- > Contact EC Department

- > Military business indicated
- > Differentiate between lethal and non-lethal applications

- > No further checks required
- > Proceed with business

# Monitoring – Forensic Research

## ❑ SAP Business Objects

- Identify discrepancies / abnormalities in the Delivery Note(s)
- Perform post-shipment spot checks on transactions

Title ▲	Type	Last Run
10_ex-SGP__SiClass-Not=N_and_SG-Lic=Blank	Web Intelligence	Feb 1, 2019 8:23 AM
11_ex-SGP__SiClass_Not_N-3A001-5A002-5B002-5D002-5E002	Web Intelligence	Feb 1, 2019 8:06 PM
12_ex-SGP_SoldTo=SGP_ShipTo_unequal_SGP	Web Intelligence	Feb 1, 2019 8:19 PM
13_ShipToCountry=CriticalCountries	Web Intelligence	Feb 1, 2019 8:23 PM

**Query Filters**

DeliveryDate Greater than or Equal to Enter value(s) for DeliveryDat

DeliveryDate Less than or Equal to Enter value(s) for DeliveryDat





AND ShipFrom\_Country In List Type a constant

ShipTo\_Country In List Type a constant

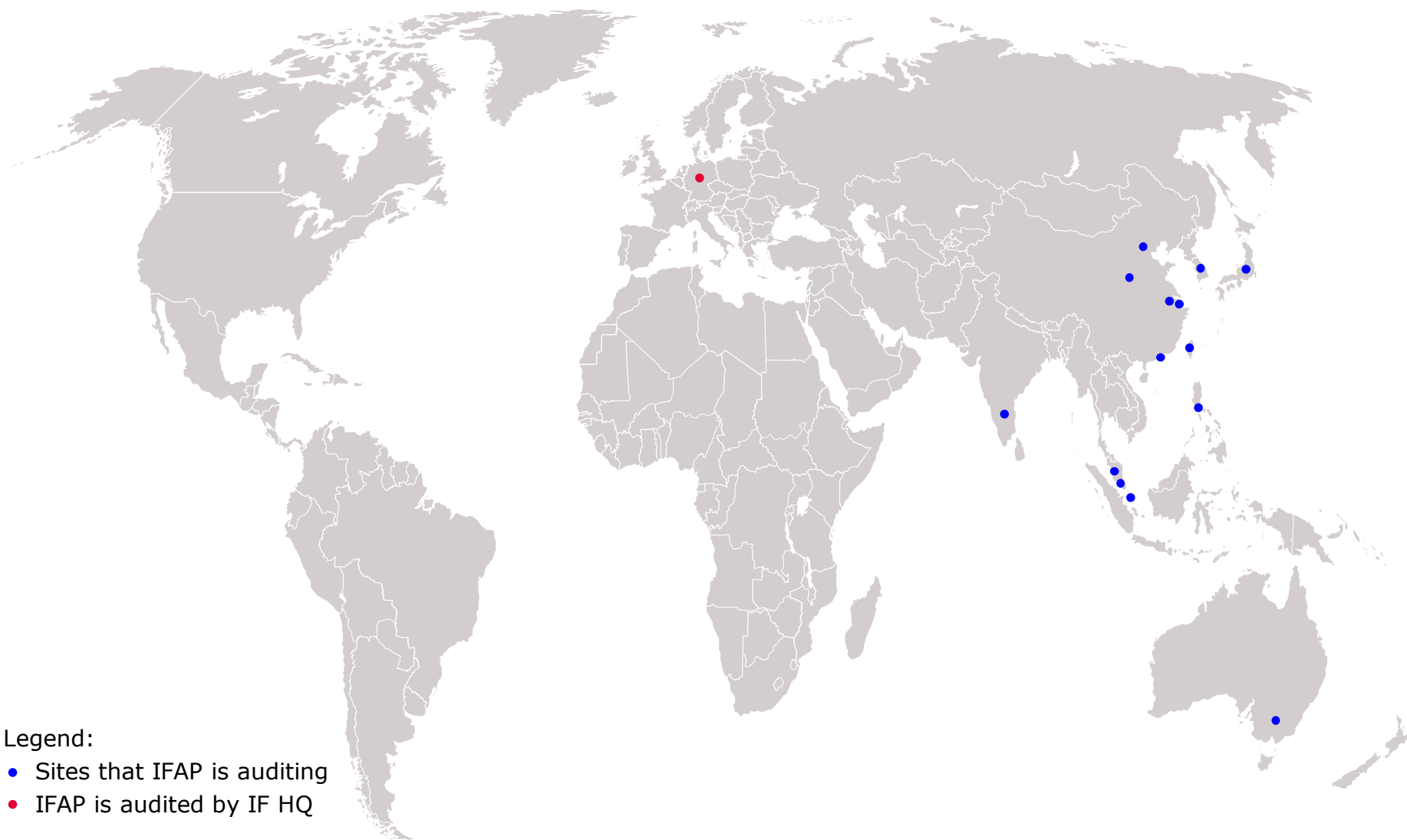
E.g. Check for shipments to embargoed countries



# Monitoring – Sample Report

Status	Sites	License Assignment	Classification Value	Export to US and UNSC Embargoed Countries	Country Specific Regulation
	Singapore	<ul style="list-style-type: none"> <li>License was assigned to every order with controlled products</li> <li>Licenses are still within validity period</li> </ul>	No invalid classification for both SICLASS and ECCN	No shipment to embargoed countries	-
	Malaysia (Malacca & Kulim)	<ul style="list-style-type: none"> <li>License was assigned to every order with controlled products</li> <li>Orders were assigned with re-export license when applicable</li> <li>Licenses are still within validity period</li> </ul>	No invalid classification for both MYCLASS and ECCN	No shipment to embargoed countries	No shipment to Israel
	Indonesia	No license is required for re-export	No invalid classification for both ALNR and ECCN	No shipment to embargoed countries	-
	China (Shanghai & Wuxi)	No license is required for re-export	No invalid classification for both ALNR and ECCN	No shipment to embargoed countries	-

# Monitoring - Audits

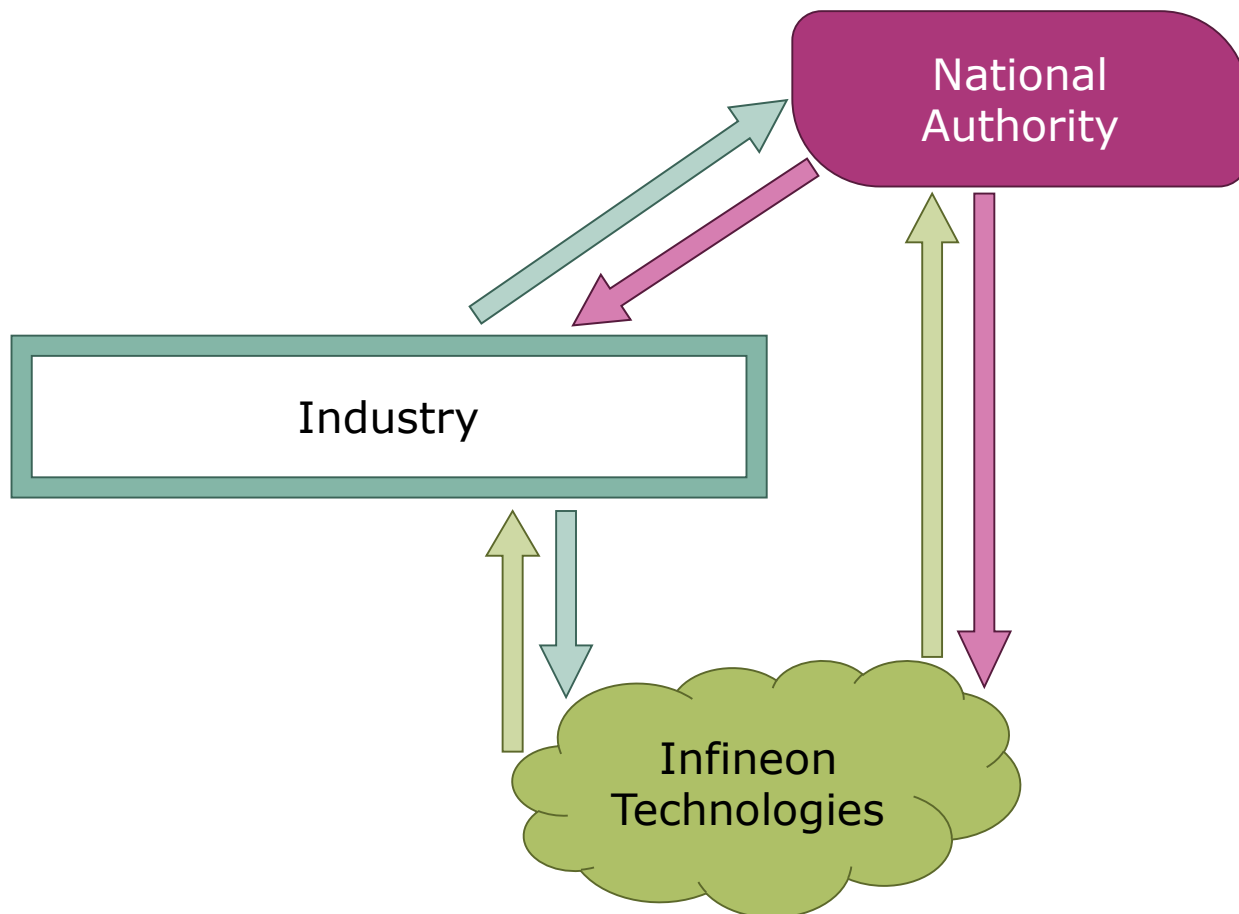


# Agenda

- 1 About Infineon Technologies
- 2 Export Control & Customs Global Directives
- 3 How do we comply
- 4 **Our Aspiration**

# Our Aspiration

“Become *the* worldwide recognized compliant partner”



Working hand in hand with the industry, the authorities and internally within the company

# External Engagement



Export Control Collaborative Workshop

## Networking our way to a culture of compliance

10/26/2017 ★★★★★ (2) [Share on My Site](#)

Government representatives and trade compliance experts from global companies gathered at the inaugural Export Control Collaborative workshop organized by the IFAP Export Control team on October 13th. Themed as “Fostering a Culture of Compliance”, the workshop provided a platform for open dialogues and best practices sharing between regulatory authorities and the participants.



Group photo taken at the Workshop: Representatives of Government agencies - Bureau of Industry and Security, U.S. Department of Homeland Security and Singapore Customs together with industry folks

Mexico City

## Wiesbaden Conference on non-proliferation policies

7/31/2017 ★★★★★☆ (7) [Share on My Site](#)

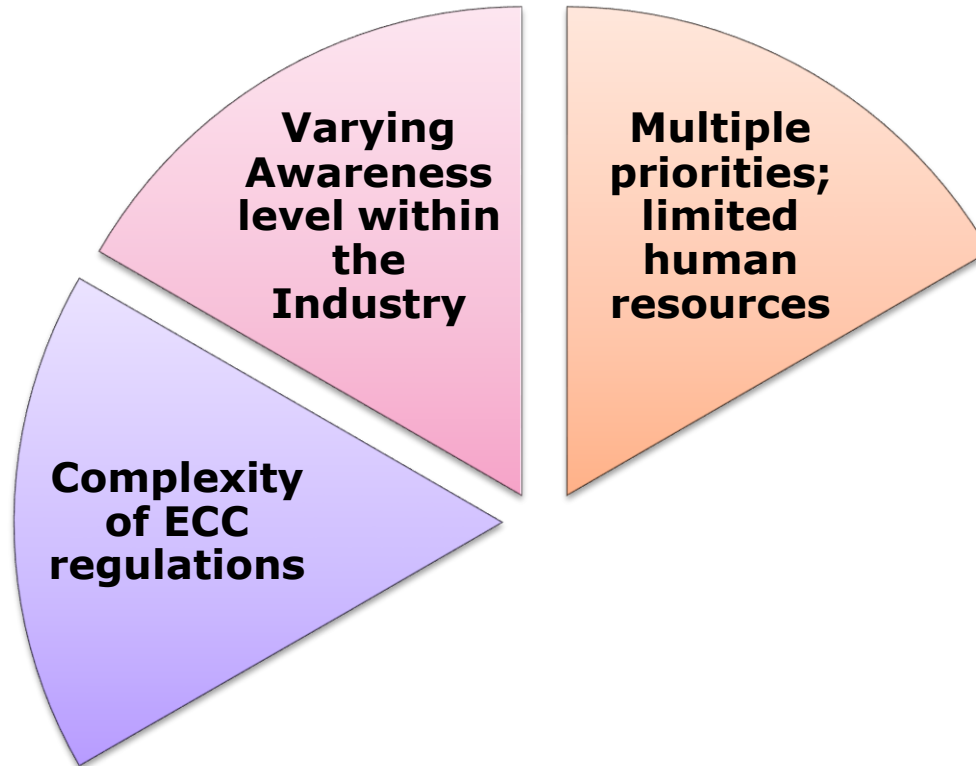
Infineon took part in its second Regional Wiesbaden Conference in Mexico City. The conference brought together members of the UN 1540 Committee, national authorities, NGOs and global enterprises to discuss the interpretation of non-proliferation laws and regulations and their implementation within industry. Hosted by the government of Mexico, the conference was organized in coordination with the Security Council Committee established pursuant to UN Resolution 1540 (2004) and was supported by the United Nations Office for Disarmament Affairs with financial support from the government of Germany.



Working hand in hand with the industry and government authorities



# Motivation for a Trade Compliance Working Group



# Benefits of a Trade Compliance Working Group



# In a Nutshell ...



## A Trade Compliance Working Group allows:

- A common platform to discuss on strategic and operational topics in ECC Compliance
- Sharing of best practices, building of relationship and leveraging on each others' expertise in trade compliance
- To have a "common voice" to the authorities when engaging them for trade compliance topics

Lastly ...

# Thank you for your kind attention!



Cicilia

Humairah

Gregory

Seow Fong

**Please feel free to reach out to me at:**

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Office: +65 6876-3013

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[ifapexportcontrol@infineon.com](mailto:ifapexportcontrol@infineon.com)



Part of your life. Part of tomorrow.

