

*FCC Academy presents*

# Designing an Internal Compliance Program for Export Controls & Sanctions

1 October 2019, 9.30 am - 4.30 pm

Landgoed Groenhoven, Bruchem, The Netherlands

## Invitation

Full Circle Compliance now welcomes registrations for its Academy Training Course entitled “Designing an Internal Compliance Program for Export Control & Sanctions”.

## Course Description

Organizations handling military and dual-use items must comply with export control laws and regulations and related trade restrictions, such as sanctions and embargoes. Developing an Internal Compliance Program (ICP) is considered a best practice to ensure compliant transactions and to prevent non-compliance situations that can disrupt business operations and access to important markets and technologies. But having an internal compliance program is more than just meeting regulatory requirements; it enhances trust among business partners and government officials, and when organized efficiently, it can create new business opportunities.

## Who should attend?

This course is specifically designed for compliance officers and those in a similar role who aim to enhance their organization's export compliance efforts. The course provides valuable insights for both employees and (senior / middle) management working in any industry subject to U.S. and/or EU (member state) export control laws and sanctions regulations.

## Instructors



**Ghislaine C.Y. Gillessen**

Partner and Managing Director



**Marco F.N. Crombach**

Senior Manager

## Fee

€ 475  
(excl. VAT)

## Early-Bird Fee

€ 400  
(excl. VAT)

SAVE €75,-  
by signing up  
before 20 August 2019.

## Government employees

15% Discount

## Course Topics

The course will cover multiple topics and tackle various key questions, including but not limited to:

- Setting the Scene
- What is expected from your organization?
- Key elements of an ICP
- Best practice tips for enhancing your ICP
- Examples of policies and procedures
- Strategic benefits.

This course includes hands-on exercises and peer group networking.

## Course Objectives

Upon completion of this course, participants will have gained / be able to:

- Answer why ICPs continue to gain importance
- Understand what relevant government agencies expect from your organization
- Understand key elements and conditions for a robust and effective ICP
- Understand how you can utilize compliance as a business enabler
- Practical tips and tricks for enhancing your current activities

### Course Level

Intermediate

### Course Language

English

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### Upcoming Events

**Tuesday, 9 April 2019**

U.S. Export Controls:  
ITAR & EAR from a Non-U.S. Perspective

**Tuesday, 7 May 2019**

An Introduction to EU / Dutch Dual-Use and  
Military Export Controls

**Tuesday, 26 November 2019**

U.S. Export Controls:  
The International Traffic in Arms Regulations  
(ITAR) from a non-U.S. Perspective

**Wednesday, 27 November 2019**

U.S. Export Controls:  
The Export Administration Regulations (EAR)  
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# Agenda

- 9.00 am Registration / Welcome**
- 9.30 am Opening Remarks**  
*Drs. Ghislaine Gillessen RA*
- 9.45 am Session I: Setting the Scene: Ensuring Compliance in the Export Control and Sanctions Arena**  
*Drs. Ghislaine Gillessen RA & Marco F.N. Crombach MSc*
- 11.00 am Coffee Break**
- 11.15 am Session II: What do Governments expect from your organization? Official Compliance Guidelines and Key ICP Elements**  
*Drs. Ghislaine C.Y. Gillessen RA & Marco F.N. Crombach MSc*
- 12.30 pm Lunch Break**
- 1.30 pm Session III: Assignment**  
*Drs. Ghislaine C.Y. Gillessen RA & Marco F.N. Crombach MSc*
- 3.00 pm Coffee Break**
- 3.15 pm Session IV: Best Practice Tips for Developing and Enhancing your Internal Compliance Program**  
*Drs. Ghislaine C.Y. Gillessen RA & Marco F.N. Crombach MSc*
- 4.30 pm Drinks & Bites**

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## Registration

To register, please complete the registration form (available on the event page on the Full Circle Compliance) and submit it to [events@fullcirclecompliance.eu](mailto:events@fullcirclecompliance.eu).

Payment details will be sent after submitting your registration. All places are subject to availability.

\* The event requires a minimum number of ten attendees to proceed.

## Certification

Participants will receive a certificate upon completion of the training event.

## Contact Us

If you have any questions concerning this event, please contact us at [events@fullcirclecompliance.eu](mailto:events@fullcirclecompliance.eu) or + 31 (0)6 15 65 02 09.

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## Course Instructors



**Drs. Ghislaine C.Y. Gillessen RA**  
*Partner and Managing Director*

Ghislaine is a member of the Netherlands Institute of Chartered Accountants. She was the first independent auditor to perform a trade compliance audit of the Dutch Ministry of Defense. She advises multinational corporations on framework integration of complex legislation. Ghislaine Gillessen is the author of "Compliance", a chapter in the book *United States Export Controls*, published in 2017 by the *Law Journal Press*. In her chapter, Ghislaine discusses several topics on compliance, including "The Culture Issue", "Steps Toward Effective Compliance", "Automation of Compliance Processes", "Maturity Levels of an ICP, and "Compliance Audits"



**Marco Crombach MSc**  
*Senior Manager*

Marco Crombach has gained extensive corporate experience before joining FCC. He worked for 14 years for Koch Industries Inc., where he led a Customs and International Trade Compliance department for 5 years. Marco is an expert in drafting Trade Compliance Policies & Procedures, International Trade Compliance Metric & KPI Dashboards, and Global Customs & International Trade Compliance Manuals.

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## Venue

The Training Course will be held at the Full Circle Compliance office at Landgoed Groenhoven in Bruchem, the Netherlands.

### Address

Full Circle Compliance  
Landgoed Groenhoven  
Dorpsstraat 6  
5314 AE Bruchem  
The Netherlands

### Via Highway

From A2, take the exit 17 Zaltbommel and follow the signs for Landgoed Groenhoven in Bruchem.

### Via Public Transport

Zaltbommel Train station; Bus 49, 266 or 268 to Bruchem Den Hoek



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## FCC Academy

*Why invest in compliance training?*

Trade Compliance Training is not required by any law or regulation. But we all know that training employees in trade compliance matters can mitigate the overall risk of an organization dealing in cross-border trade. All levels of the organizational hierarchy should be made aware of their compliance responsibilities, from the management on down to the multiple departments in your organization. Compliance Training can mitigate trade compliance risks by increasing the overall awareness of participants so that they can recognize potential compliance issues. Compliance Training is also a key element of an Internal Compliance Program (ICP), which helps you to prevent compliance breaches and demonstrates your reliability to government authorities.

### The benefits of Compliance Training for:

#### Organizations

- Thoroughly and systematically educates all your employees and managers about relevant compliance issues, using updated and reliable content
- Helps prevent compliance violations and significant potential fines and penalties
- Satisfies governmental compliance requirements
- Avoids liability issues, because training documentation demonstrates proactive compliance efforts of your organization
- Protects your reputation
- Communicates organizational values to employees
- Forms an integral part of the implementation of relevant standards, e.g. ISO 19600 and COSO

#### Employees

- Knowledge of relevant legal requirements and how to use them
- Understanding of the need for compliance measures
- Guidance on how to act in accordance with legal and regulatory requirements
- Awareness of possible risks
- Identify potential compliance problems before a violation occurs
- Advises on possible action to take should a compliance risk be identified, and offers clear support
- Support in implementing changes and how processes can operate effectively

## FCC Academy

### *Our solutions*

The Full Circle Compliance Academy offers a wide variety of high-impact multi-level training programs to keep you up-to-date with the latest regulatory requirements and industry's best practices. Our expertise covers the wide spectrum of international trade compliance, including U.S. and EU military and dual-use export controls, sanctions and embargoes, customs, anti-corruption, and anti-bribery. We also offer compliance program-related courses, including a risk identification & mitigation and compliance audit module, and a module centered around the topic of technology protection and cybersecurity.

The aim of the FCC Academy is to increase the value of human capital within your organization by supporting personal growth and professional development. Our courses are designed to empower, interactive, and always up-to-date with the latest regulatory requirements and industry's best practices. The relatively small size of our course groups (between 8 and 16 persons.) allow for close interaction and an informal exchange of knowledge, experiences, and perspectives. Our ultimate goal is to help participant's understanding and translating regulatory requirements into effective and robust control mechanisms, enhancing their organization's compliance efforts, and ultimately utilize compliance as a business enabler.

Currently, FCC is finalizing the setup of an e-learning platform to make its training modules, including the EMITC curriculum, accessible to a global audience.

In addition to our in-house training courses, FCC can provide the following training services:

- Tailored Executive Courses
- Compliance audit module for consultants, lawyers, and auditors
- Customized training for all levels (general awareness, intermediate, advanced)
- E-learning, tailored to your requirements
- Remote / virtual training sessions
- Advanced regulatory compliance seminars and events
- Interactive forums with peers





## Only for FCC Academy Training Course Participants!

# 15 % Discount on the “BITAR”

Bartlett’s Annotated International Traffic in Arms Regulations (“BITAR”), edited by Full Circle Compliance partner James E. Bartlett III and the Full Circle Compliance Team, is the only available fully updated copy of the ITAR. More information on the BITAR is available on the Full Circle Compliance website.

	25 Features of Free ITAR Versions with The Annotated ITAR (“BITAR”)	22 CFR (Official)	GPO’s “e-CFR”	The BITAR
1	Free; can be shared or placed on company servers for multiple viewer without copyright restriction	✓	✓	X
2	Can be cited as legal authority in court pleadings and official documents		X	X
3	Updated within 48 hours of Federal Register amendment effective dates? (Official version is updated annually.)	X	✓	✓
4	If amendment takes effect on a future date, footnote explains	X	X	✓
5	Contains Table of Contents for each chapter	✓	✓	✓
6	Contains Table of Contents to entire ITAR	X	X	✓
7	Downloadable Word copy available.	X	X	✓
8	Downloadable PDF copies available	X	X	✓
9	Downloadable PDF “Compact Edition” available	X	X	✓
10	Printed tabbed copies available	X	X	✓
11	Contains history of amendments	X	X	✓
12	Contains footnotes citing ITAR errors	X	X	✓
13	Contains footnotes citing related Federal court cases	X	X	✓
14	Contains cross-references to related ITAR sections	X	X	✓
15	Contains counsel “Practice Tips”	X	X	✓
16	Contains 30-page detailed Index	X	X	✓
17	Permits readers to add Index items to future editions	X	X	✓
18	Contains appendix list of ITAR amendments since 2007	X	X	✓
19	Contains Glossary defining acronyms	X	X	✓
20	Contains links to DDTC guidance FAQs	X	X	✓
21	Contains text of Arms Export Control Act, linked to ITAR	X	X	✓
22	Contains separate list of ITAR exemptions by subject and paragraph number	X	X	✓
23	Contains separate list of Presumed Denial Countries	X	X	✓
24	Permits readers to print copies in format size of choice	X	X	✓
25	Permits readers to contact editor with questions about document format and history	X	X	✓

## FCC's Newsletter "The Daily Bugle"



The Export/Import Daily Update (“The Daily Bugle”) is a newsletter emailed every business day to thousands of subscribers, to inform readers of changes to defense and high-tech trade laws and regulations. We check the following U.S. sources daily:

- Federal Register
  - Congressional Record
  - Commerce/AES
  - Commerce/BIS
  - DHS/CBP
  - DOJ/ATF
  - DoD/DSS
  - DoD/DTSA
  - State/DDTC
  - Treasury/OFAC
  - White House
- and similar websites of:
- Australia
  - Canada
  - European Union
  - U.K.
  - and other countries and international organizations

It is also possible to advertise in the Daily Bugle. We provide several advertising positions in the Daily Bugle at various rates. For more information, please visit our advertising page or contact us via email, [advertising@fullcirclecompliance.eu](mailto:advertising@fullcirclecompliance.eu).

You can receive import and export related news by signing up to the Daily Bugle on our website.



# Event Policy

## **Cancellations**

All cancellations received at least 15 business days prior to the training course will be refunded 80%. If you do not cancel within the allotted time period, payment is due in full. You may substitute another individual to attend the program at any time. Please note that any training course may be cancelled if bookings are too low to make it worthwhile. If we have to cancel a training course, any attendance fees already paid will be reimbursed without undue delay or used as credit for a future course. You will be informed by email or telephone if the event is cancelled or postponed.

## **Privacy**

Personal data will not be disclosed to third parties and will only be held for the purpose of registering training course participants. Any information about you will be held securely by Full Circle Compliance, in accordance with the GDPR and Data Protection Act 2018. Full Circle Compliance reserves the right to publish photographs and videos from its events on its website, in its newsletter "Daily Bugle", in print and on its social media (for marketing purposes). You can withdraw your consent at any time by sending an email to [gdpr@fullcirclecompliance.eu](mailto:gdpr@fullcirclecompliance.eu). More information on our Privacy Policy is available on our website under Terms and Conditions.

## **Future Offers**

Full Circle Compliance can send you emails containing news, updates and promotions regarding Full Circle Compliance events. You can withdraw your consent at any time by sending an email to [gdpr@fullcirclecompliance.eu](mailto:gdpr@fullcirclecompliance.eu).

## **Dress Code**

The dress code is business casual.

## **Special Dietary Requests**

Beverages, snacks, and a lunch will be served during the event and are included in the fee. Special dietary requests can be accommodated.

## **Hotel Accommodation**

The cost of accommodation is not included in the admission fee. Please contact us at [events@fullcirclecompliance.eu](mailto:events@fullcirclecompliance.eu) for accommodation suggestions.