



A World View on Compliance Training



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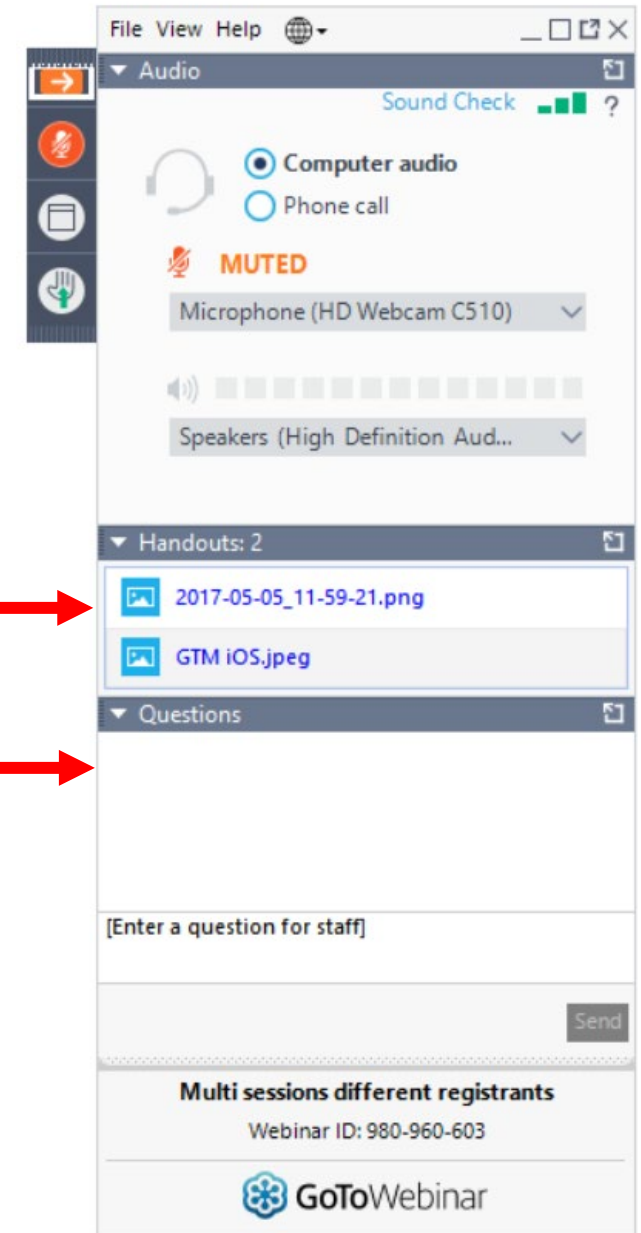
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SPEAKERS

Introduced By:



Brad Kabanuk

Founder and President
-Content Enablers



Debi Davis

President and CEO
-Davis ITC



Abhishek Kishore

Managing Director International
-OCR Services Inc.

Agenda

- **Welcome and Introductions**
- **Regulatory Drivers For Compliance Training**
- **Global Perspectives On Compliance Training**
- **Emerging Trends In Training And Best Practices**
- **Q&A**



contenten>blers

Compliance Training

A Current Perspective

13 March 2024



Regulatory Drivers for compliance training

Brad Kabanuk

President
Content Enablers



Catalysts driving change in the current state

Increased regulatory environment

Disrupted workplace

- More distributed,
- More remote,
- More flexible work arrangements



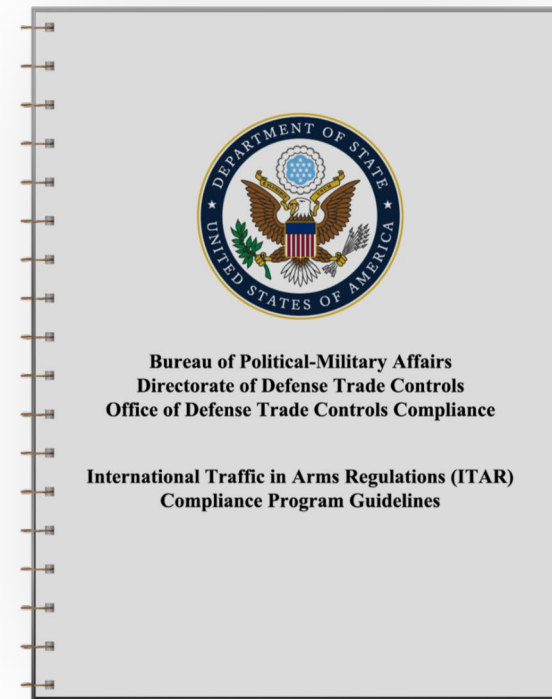


New DDTC Training Guidelines

On December 5, 2022, DDTC announced new ITAR Compliance Program Guidelines that include specific and detailed training requirements. These new guidelines leave little doubt as to what the agency will look for when evaluating the effectiveness of an ITAR compliance training program:

- Training that is based on employees' job functions and compliance responsibilities;
- Training that addresses the risks associated with the organization's defense articles and services, the parties it does business with, and the geographic areas it operates in and exports to;
- Training that is trackable, available, and recurring; and
- Training that is dynamic and up to date.

The guidelines also provide an extensive list of topics required for adequate training.





Function-Based



DDTC recommends that organizations provide
“different levels and types of ITAR training depending on the knowledge and skills needed to perform [certain] job functions and the compliance risks that arise in each position.”



While recognizing that specific training requirements depend on an organization's risk profile, DDTC suggests four tiers of training:



Tier 1:

Personnel with little/no background in exports

Learning Objective:
Introduce the basics of export controls.



Tier 2:

Senior management, board of directors, etc.

Learning Objective:
Provide a thorough, intermediate-level understanding of export controls, enabling a proper appreciation of compliance risks associated with their organization's activities and the critical role they play regarding compliance.



Tier 3:

Personnel with export functions (program management, technical personnel, logistics, supply chain, BD, human resources, IT, faculty involved with contracts and grants, foreign students participating in research, etc.)

Learning Objective:
Provide an advanced-level understanding of the ITAR and their export compliance responsibilities.



Tier 4:

Export compliance personnel, including empowered officials and legal counsel

Learning Objective:
Provide a thorough, detailed understanding of the organization's ICP, all applicable export control regulations, and the future needs of their organization (MAD activities, new product lines, geographic expansions, etc.).



Professional Trade Compliance Training






DAVIS
INTERNATIONAL
TRADE
CONSULTING
SERVICES

Debi Davis
President & CEO, Davis ITC

March 13, 2024

Training

developing the skills, experience, and
employees need to perform
improve their performance
skills, and abilities, specific



Agenda

- **Why Should Companies Focus on Training?**
- **Global Internal Compliance Program(ICP) Requirements**
- **Ensuring Training Hits the Target**
- **Why training fails –**
 - **and What To Do About It**

Why Should Companies Focus on Training?



Why Focus on Training

- Policies and Procedures won't work if employees don't understand WHAT is required and WHY
- Recent enforcement actions have addressed training requirements
- Government Organizations have made it clear that training is an important element of a company's Internal Compliance Program ("ICP")



Enforcement Example

- Standard language in most Consent Agreements calls out specific requirements for training
 - Strengthened Compliance Policies, Procedures, Training
 - all employees engaged in AECA and ITAR-regulated activities are familiar with the AECA and the ITAR, and their own and Respondents' responsibilities thereunder
 - there are records indicating the name of employees, trainers, and level and area of training received
 - Respondent shall also provide training to all employees to ensure that any type of electronic transmission of ITAR-controlled technical data are sent in accordance with Respondent's export compliance policies and procedures

UNITED STATES DEPARTMENT OF STATE
BUREAU OF POLITICAL-MILITARY AFFAIRS
WASHINGTON, D.C. 20520

In the Matter of:

The Boeing Company

A Delaware Corporation

Respondent

CONSENT AGREEMENT

WHEREAS, the Directorate of Defense Trade Controls, Bureau of Political-Military Affairs, U.S. Department of State (Department) has notified The Boeing Company, including its operating divisions, subsidiaries, and business units (collectively Boeing or Respondent) of its intent to institute an administrative proceeding pursuant to § 38 of the Arms Export Control Act (AECA), 22 U.S.C. § 2751 *et seq.*, and its implementing regulations, the International Traffic in Arms Regulations (ITAR), 22 CFR parts 120-130;

WHEREAS, Respondent has reviewed the Proposed Charging Letter and this Consent Agreement, fully understands these documents, and enters into this Consent Agreement voluntarily and with full knowledge of its rights;

WHEREAS, the Department acknowledges that Respondent voluntarily disclosed all matters referenced herein, a considerable majority of which predate 2020, after which Respondent incorporated numerous improvements to its compliance program; and that Boeing voluntarily expanded the scope of its internal investigation into these matters, and cooperated with the Department's review of these matters;

WHEREAS, Respondent, without admitting or denying the allegations, wishes to settle and dispose of all potential ITAR civil charges, penalties, and sanctions arising from the Proposed Charging Letter, and certain facts disclosed in writing to the Department and identified in paragraph 26, by entering into this Consent

Enforcement Example Consent Agreement

PROPOSED CHARGING LETTER

Mr. Gary Darling
President
Darling Industries, Inc.
3749 N. Romero Rd.
Tucson, AZ 85705

Re: Alleged Violations of the Arms Export Control Act and the International Traffic in Arms Regulations by Darling Industries, Inc.

Dear Mr. Darling:

The Department of State ("Department") proposes to charge Darling Industries, Inc., including its operating divisions, subsidiaries, and business units ("Respondent") with violations of the Arms Export Control Act (AECA), 22 U.S.C. 2751 *et seq.*, and the International Traffic in Arms Regulations (ITAR), 22 CFR parts 120-130, in connection with unauthorized exports of defense articles; the unauthorized furnishing of defense services; and failure to appoint qualified Empowered Official. A total of six (6) violations are alleged at this time.

The essential facts constituting the alleged violations are described herein. The Department reserves the right to amend this proposed charging letter, including through a revision to incorporate additional charges stemming from the same misconduct of Respondent. This proposed charging letter, pursuant to 22 CFR § 128.3, provides notice of our intent to impose debarment or civil penalties or both in accordance with 22 CFR § 127.10.

When determining the charges to pursue in this matter, the Department considered a number of mitigating factors. Most notably, the Respondent: (a) submitted voluntary disclosures pursuant to 22 CFR § 127.12 that acknowledged the charged conduct and other potential ITAR violations; (b) entered into an agreement with the Department's Directorate of Defense Trade Controls ("DDTC") tolling the statutory period; and (c) instituted a number of self-initiated compliance program improvements. However, Respondent also disclosed that it did not notify DDTC immediately after discovering a violation, in accordance with the guidance in 22 CFR § 127.12(c). Due in part to Respondent submitting its voluntary disclosure to DDTC twenty-two (22) months after discovery, the submission included conduct outside of the time for commencing proceedings, applicable to the AECA and the ITAR. See 28 U.S.C. § 2462. The Department

rocket motor insulation and exhaust components; oxygen breathing hose and related life support equipment; custom mixed rubber compounds; and compression molded rubber components. R.E. Darling primarily manufactures defense articles with the remaining business of R.E. Darling accounting for non-defense aerospace and industrial products. R.E. Darling engages in both domestic sales and foreign sales.

VIOLATIONS

ITAR violations included in this proposed charging letter are derived from R.E. Darling's voluntary disclosures, most significantly, the results of a compliance program review conducted from August 20-21, 2014 by an outside consulting firm. The self-initiated compliance program review described decades of systematic, reoccurring violations involving R.E. Darling's manufacture and sale of ethylene propylene diene monomer compound ("EPDM"), a Kevlar filled, raw material used as a missile case insulator and missile motor insulator, controlled under USML IV(h) and breathing hoses, controlled under USML VIII(h).² EPDM is also designated on MTCR Annex, Category II- Item 3.

The outside consulting firm's compliance program review identified unauthorized exports in which R.E. Darling did not obtain or attempt to obtain the required license from the Department. According to this report, R.E. Darling did not have a documented export compliance program, including a mechanism to determine the export jurisdiction of its products. The review noted that R.E. Darling delegated export compliance responsibilities to staff who had not been provided export compliance training, and the staff relied on personal knowledge or on the customer to inform them that the products R.E. Darling manufactured and/or exported were ITAR controlled. Also, R.E. Darling's understanding of license requirements was largely driven by the advice of foreign customers. R.E. Darling acknowledges that its lack of qualified personnel, ITAR compliance training, classification system, and documented export compliance program, as identified by the compliance program review, resulted in violations.

² 78 FR 22740 and 78 FR 22759 revised USML Category VIII, effective 10/15/2013. 79 FR 34 revised and 79 FR 36393 corrected USML Category IV, effective 07/01/14. CJ-0210-18, dated July 5, 2018, determined the USML category for the EPDM was IV(h) from 1999 to March 2014. Revisions to the USML announced in 79 FR 36393 establish the jurisdiction of the EPDM from July 1, 2014 to present as IV(h)(21). CJ-0212-18, dated June 25, 2018, determined the USML category for the breathing hoses was VIII(h) for September 15, 2009 to September 2013. Revisions to the USML announced in 78 FR 22759, established the jurisdiction and classification of the breathing hoses from October 15, 2013 to present as ECCN 9A610.x.

Proposed Charging Letter

The company "delegated export compliance responsibilities to staff who had not been provided export compliance training, and the staff relied on personal knowledge or on the customer to inform them that the products manufactured and/or exported were ITAR controlled."

The company "acknowledges that its lack of qualified personnel, ITAR compliance training, classification system, and documented export compliance program, as identified by the compliance program review, resulted in violations."

Consent Agreements Available on Dept of State Website

https://www.pmdtdc.state.gov/ddtc_public/ddtc_public?id=ddtc_kb_article_page&sys_id=384b968adb3cd30044f9ff621f961941



Elements of an Internal Compliance Program (ICP)

Common Elements of an ICP



- While ICPs vary somewhat by country, the requirements and expectations are similar for all countries
- Training is a key element of all programs

ICP Guidance – United Nations



United Nations Guidance

“Private Sector Engagement in Strategic Trade Controls: Recommendations for Effective Approaches on United Nations Security Council Resolution 1540 (2004) Implementation”

6. Training and human resources matters

- Important: **selection of staff/skills**; experience and knowledge of staff
- **Training of all staff concerned**: hold seminars for compliance staff, in-house training for operating personnel
- Hold **general export control awareness seminars** for remaining staff

ICP Guidelines – Wassenaar Arrangement



Best Practice Guidelines on Internal Compliance Programmes for Dual-Use Goods and Technologies

<p><u>6. Training</u></p>	<p><u>6. Training</u></p>		
<p><u>6.1. Training and education of officers and employees</u> - Ensure that staffs are aware of all domestic export control laws, regulations, policies and control lists and all amendments to them as soon as they are made public.</p>	<p><u>6.1. Training and education of officers and employees</u> - Archive internal training records including staff participation in external events.</p>	<ul style="list-style-type: none"> • Training and continued education should be carried out for employees at all levels, especially new staff, persons who work in sales, export related units, or are involved in technology transfer. • Provision of at desk training using electronic media, such as the internet and CD / DVDs, may be useful to supplement and reinforce formal training sessions 	<p>WHO:</p> <ul style="list-style-type: none"> • New Staff • Sales • Individuals involved in technology transfer <p>HOW:</p> <ul style="list-style-type: none"> • At desk • Electronic Media • Internet

ICP Guidance - European Union



EU ICP GUIDANCE FOR DUAL-USE TRADE CONTROLS

The following core elements are essential for an effective dual-use trade control Internal Compliance Programme:

1. Top-level management commitment to compliance
2. Organisation structure, responsibilities and resources
3. Training and awareness raising
4. Transaction screening process and procedures
5. Performance review, audits, reporting and corrective actions
6. Recordkeeping and documentation
7. Physical and information security

3. Training and awareness raising

Training and awareness raising on dual-use trade control is essential for staff to duly perform their tasks and take compliance duties seriously.

What is expected?

The company ensures via training that the dual-use trade control staff is aware of all relevant export control regulations as well as the company's ICP and all amendments to them. Examples of training material are external seminars, subscription to information sessions offered by competent authorities, in-house training events, and so on.

Furthermore, the company carries out awareness raising for the employees at all relevant levels.

“Essential for staff to duly perform their tasks and take compliance duties seriously”

ICP Expectations - UK



Davis ITC

UK ECJU ICP

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Guidance

Checklist of internal export control compliance procedures

Updated 23 December 2022

Personnel records and training

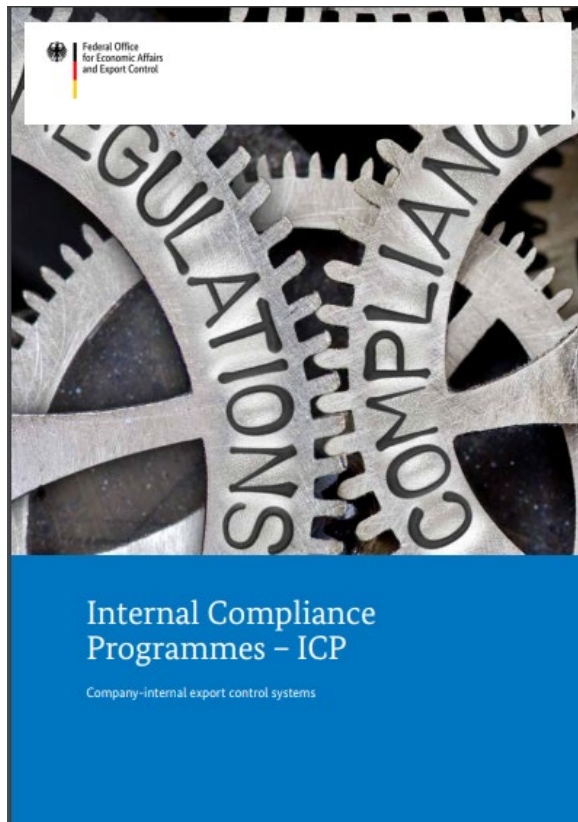
You should regularly check:

- that your records of personnel involved in export control are up-to-date
- that all employees who have the ability to make exports (including everyone with access to email, telephone and fax can potentially export technology) received the necessary induction, training or retraining

ICP Expectations - Germany



German BAFA ICP



4.7 Selection of staff, training and awareness-raising

4.7.1 Selection of staff

Not every employee is suitable for performing tasks in internal export control.

Export control staff must have

- ▶ knowledge of foreign trade and payments law
- ▶ knowledge of the licence application process
- ▶ knowledge of a company's production processes/ organizational skills

or learn them promptly.

The export/transfer control staff are trained, for example by means of employee induction programs, and are familiarized with the job requirements.

ICP test questions:

Training	BAFA information
Which trainings are conducted for export control staff, how frequently do they take place and how are they documented?	The export control staff must be up-to-date if the relevant regulations and procedures are changed. The export control staff should have the opportunity at least once per year to attend further internal or external trainings about the topic of export control. All training certificates are to be stored. They are included in the personnel file of the respective employee.
Are trainings being held for employees who are immediately affected by export control (sales, shipping, project managers)?	The company (CECO) must ensure that all employees with tasks in export control have the opportunity to participate in relevant training.

ICP Expectations - India



India

The elements are:

1. Management Commitment
2. Organisation structure, responsibilities, and resources
3. Screening procedures
4. Performance Review and Internal Audit
5. Training and Awareness
6. Record Keeping
7. Reporting and corrective action
8. Physical and Technical security

Steps involved:

- a. Provide mandatory and continued trainings to all the employees associated with the relevant export control activities, including new staff, persons who work in sales and supply chain management, export related units, or are involved in technology transfer, international cooperation and training, etc.
- b. Provide the trainings customised to the job/role of the employees and use the training material provided by the relevant authorities, if available.
- c. Ensure by way of these trainings that all the concerned employees are aware of and understand the relevant export control laws and regulations, which include staying updated with the changes in them.
- d. Incorporate the lessons learnt from performance reviews, audits, reporting and corrective actions in the trainings.
- e. Providing an awareness session on export control related compliances for the new employees may be useful.
- f. Undertaking an assessment/evaluation of the employees post training may also be useful.
- g. Providing desk-based training using electronic media and other virtual methods may be useful to supplement and reinforce formal training sessions.
- h. Archive the internal training records including participation of staff in external events pertaining to export control awareness, compliance, etc.

ICP Expectations – US Dept of State



Davis ITC

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**Bureau of Political-Military Affairs
Directorate of Defense Trade Controls
Office of Defense Trade Controls Compliance**

**International Traffic in Arms Regulations (ITAR)
Compliance Program Guidelines**

State Compliance Program Guidelines -

https://www.pmdtc.state.gov/ddtc_public/ddtc_public?id=ddtc_kb_article_page&sys_id=4f06583fdb78d300d0a370131f961913

ICP Expectations – US Dept of Commerce



Commerce guidance
“Elements of an Effective Export
Compliance Program”

<https://www.bis.doc.gov/index.php/documents/pdfs/1641-ecp/file>

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Ensuring Training Hits the Target



Details of Training Expectations

- State:
 - Training programs should be tailored, dynamic, up-to-date, and adequately resourced.
 - Clearly identify the job-specific export control responsibilities for all employees.
 - Allot sufficient time for employees to complete their training.
 - Offer training on a recurring basis, at a minimum annually.
 - Maintain accurate training records of training sessions.
 - Make available resources that employees may consult at any time.
- Commerce
 - Characteristics of a good training program:
 - Provides job-specific knowledge based on need
 - Communicates the export responsibilities for each employee
 - Holds employees accountable for export training through assessments



Training

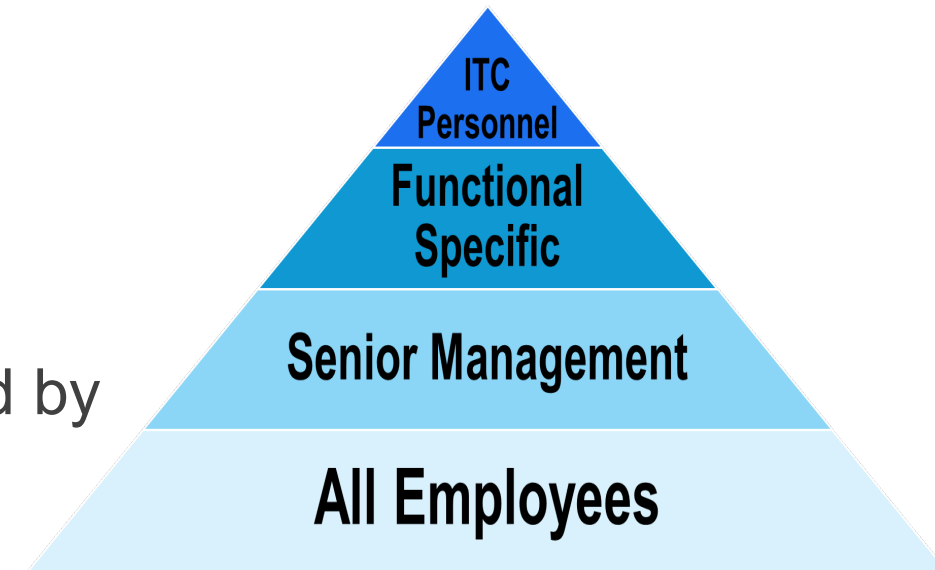
- Methods of Training
 - In person
 - Webinar
 - In House
 - Conferences



- Training SHOULD be updated and often for in-person and remote employees
- Use of e-training good option for a broader audience
 - Beware of videos – (click and ignore)
- Test to ensure understanding of training

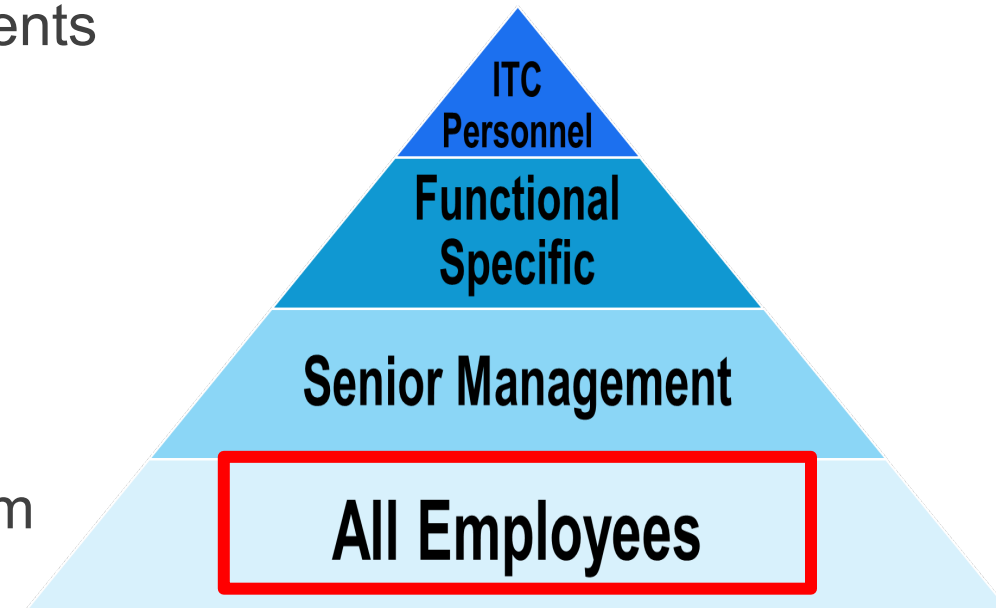
Targeting Training

- Training is not one size fits all
 - Need to develop training that focuses on the needs of the business and the employees
- Tiered approach to training
 - General Awareness for ALL Employees
 - Added requirements for Senior Management
 - Function Specific Training for any function affected by Trade Compliance
 - Higher level training specific to ITC Personnel



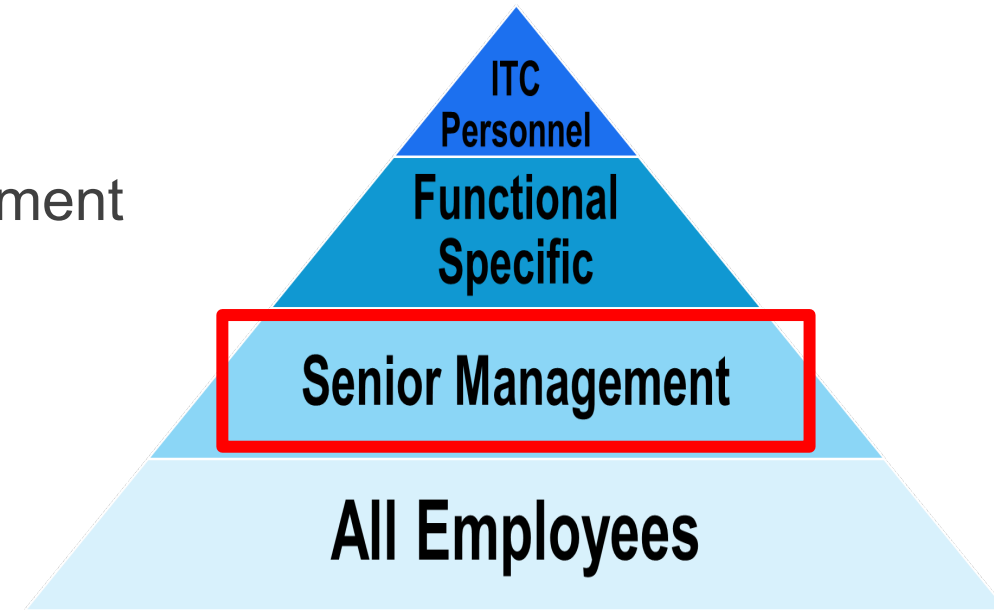
All Employee Training

- All employees need some familiarity with ITC requirements
- General Awareness Training should cover -
 - Basic overview of Export and Import regulations
 - General enough for audience to understand
 - Focused on increasing awareness – not making them experts
 - Don't forget new hires, temps, and contract employees
 - May also want to include suppliers



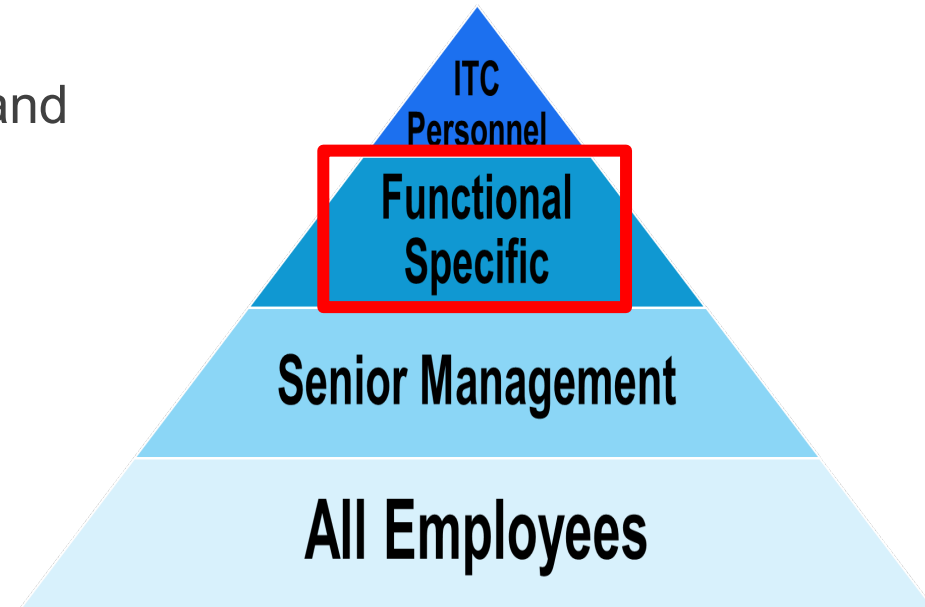
Senior Management Training

- Need additional requirements for senior management
- Additional training should focus on
 - Importance of communicating management commitment to compliance;
 - Need for adequate resources and staff;
 - Past compliance issues;
 - Government enforcement actions;
 - Potential consequences of violations;
 - Areas of Risk.



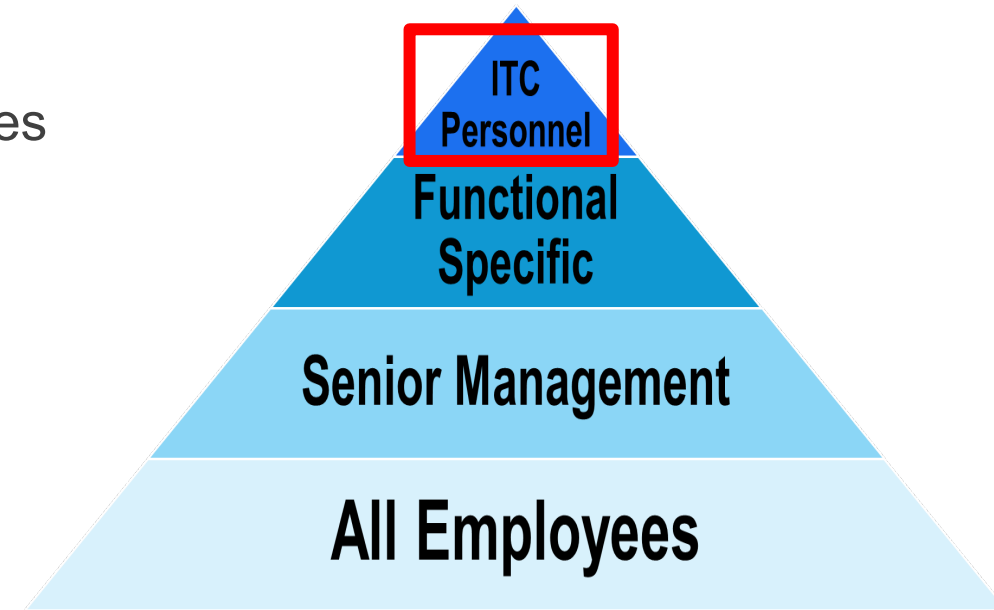
Functional Specific Training

- Provide targeted training addressing specific roles and responsibilities.:
 - Engineering – Classification, Design Rules to avoid “ITAR” contamination, Technical Data Transfer (TDT)
 - Sales/BD - Know Your Customer, Anticorruption, Screening and Denied Parties, Sanctions, TDT
 - Operations – Offshore Manufacturing or movement of manufacturing, Assists. TDT
 - Supply Chain – Import Duties, Total Landed Cost, TDT
 - Merger & Acquisition Team – Integration of businesses, registration requirement, IT, TDT
 - Shipping – Export Documentation, licensing, Customs filings, Technical Data Controls



ITC Personnel Training

- All other training +
 - Establishing and maintaining policies and procedures
 - Obtaining and tracking the use of the organization's licenses
 - Use of Control Plans (TCPs, FACP, TTCP)
 - Know your Customer and Red Flags
 - Export and Import requirements
 - Compliance/Enforcement expectations
 - Country specific requirements in other countries
 - Recordkeeping requirements
 - Other trade issues – Anticorruption, Antiboycott, Sanctions, etc...



Global Training

- Training should be global in nature – don't stop at your border
 - Every Export is an Import
 - Important to understand the rules of both the country you are exporting from and the country(ies) you export to
 - Are there restrictions on importing your product into that country?
 - Is there additional documentation required?
- Don't forget about IMPORT!
 - Tend to focus on exports but import/customs requirements are every bit as important and complex
- Need to understand extraterritorial requirements
 - If you are outside the US – need to ensure people understand what they can and can not do with US hardware, software or technology



Global Training



Davis ITC

- Tri-Seal notice issued on March 6, 2024
 - ***“Obligations of foreign-based persons to comply with U.S. sanctions and export control laws.”***
- **“Companies outside of the United States should be aware of how their activities may implicate U.S. sanctions and export control laws.”**
- **“highlights the applicability of U.S. sanctions and export control laws to persons and entities located abroad, as well as the enforcement mechanisms that are available for the U.S. government to hold non-U.S. persons accountable for violations of such laws, including criminal prosecution.”**
- **“Ensure that subsidiaries and affiliates are trained on U.S. sanctions and export controls requirements, can effectively identify red flags, and are empowered to escalate and report prohibited conduct to management.”**
- Notice available at - <https://www.justice.gov/opa/media/1341411/dl?inline>



Department of Commerce, Department of the Treasury, and Department of Justice Tri-Seal Compliance Note:
Obligations of foreign-based persons to comply with U.S. sanctions and export control laws

OVERVIEW

Today's increasingly interconnected global marketplace offers unprecedented opportunities for companies around the world to trade with the United States and one another, contributing to economic growth. At the same time, malign regimes and other bad actors may attempt to misuse the commercial and financial channels that facilitate foreign trade to acquire goods, technology, and services that risk undermining U.S. national security and foreign policy and that challenge global peace and prosperity. In response to such risks, the United States has put in place robust sanctions and export controls to restrict the ability of sanctioned actors to misuse the U.S. financial and commercial system in advance of malign activities.

These measures can create legal exposure not only for U.S. persons, but also for non-U.S. companies who continue to engage with sanctioned jurisdictions or persons in violation of applicable laws. To mitigate the risks of non-compliance, companies outside of the United States should be aware of how their activities may implicate U.S. sanctions and export control laws. This Note highlights the applicability of U.S. sanctions and export control laws to persons and entities located abroad, as well as the enforcement mechanisms that are available for the U.S. government to hold non-U.S. persons accountable for violations of such laws, including criminal prosecution. It further provides an overview of compliance considerations for non-U.S. companies and compliance measures to help mitigate their risk.

APPLICABILITY OF U.S. SANCTIONS AND EXPORT CONTROL LAWS TO FOREIGN-BASED PERSONS [U.S. Sanctions Laws](#)

In furtherance of the national security and foreign policy interests of the United States, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) administers and enforces economic and trade sanctions, primarily against targeted foreign jurisdictions and

1

Date: March 6, 2024

Why Training Fails & What to Do About It



Did you know that employees who receive formal on-the-job training programmes are *2.5 times more likely to feel empowered to do their jobs than those who do not receive such training?*

No Time For Training!!!???

FORBES > LEADERSHIP > CAREERS

Why 'I Don't Have Time For Training' Is A Lie

Kevin Kruse Contributor

CEO of LEADx and author of *Great Leaders Have No Rules*.



- surveyed everyone who chose not to participate, and asked them “why not?” The top three reasons people opted out of the program were:
 - **Being too busy**
 - **Bad timing**
 - **Irrelevant content**
- What’s interesting about the **results** is that, while the responses appear different on the surface, they **actually all mean the same** thing: **“the value of this training isn’t worth my time.”**
- If you want to increase participation in learning and development programs, the question isn’t how to make people less busy—that’s a nonstarter. **What will actually move the needle on participation is increasing the value of training and then communicating that value in a way that makes people realize they can’t afford not to make time.**

Training Success

Forbes recommends the following:

1. **Start at the top and align training to broader company strategy.**
2. **Create personal interest.**
3. **Communicate value through managers.**



Additional Thoughts

- Help people understand why and how the training applies to them (examples)
 - Communicate Timelines and monitor completion
- Create ITC Week or Month – some way to hype the focus on trade compliance and training
 - Provide a variety of training options and times to cover audience needs
- Ensure Senior Manager/C-Suite level are completing training
 - Provide talking points to encourage discussion

Training Keys to Success

- Ensure employees receive training that targets their specific roles
- Focus on the Who, What, Where, When and Why
 - Don't just tell people what to do – help them understand why
- Provide training in multiple formats
- Refresh training on a regular basis
- Remember new employees and contract/temporary employees
- Ensure training is Global in nature
- Its not just about the ITAR!
 - Cover EAR, Customs, Non-US Regs, Census, OFAC





Emerging Trends in Training and Best Practices



The key trends in compliance training

- Digital solutions are now THE primary means to delivering
- Microlearning!!!!
- New forms of engagement are emerging (V/R, Simulation, Scenario based, SMS text-based, open discussion forums)
- Adaptive – learners prove what they already know with instruction on what they do not know
- Reinforcement and reminders are moving to a “nudge” based approach that is “just in time”.
- From activity to outcomes based.



Digital is the way forward

- 80% of the global population owns a smartphone
- By 2025, 70+% of users will only use their smartphone to access the internet
- Mobile data usage almost doubled since the beginning of the pandemic.
- Mobile access and convenience are seen as more positive ways to engage your work population.





Digital is the way forward

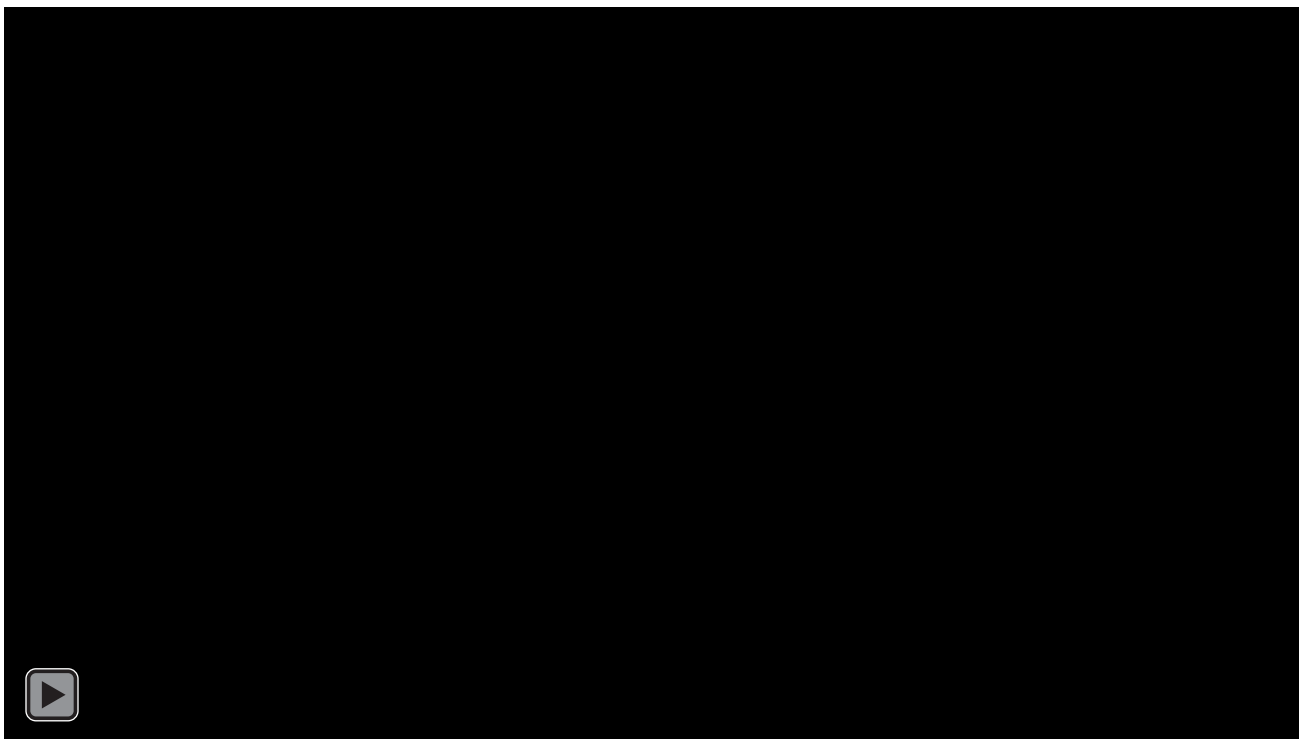
Virtual Reality:

- getting cheaper and easier to create and access.
- 75%+ retention rate versus 5%-10% for lectures/live virtual training
- Massive investments in the “metaverse” are underway which will drive costs even lower.



Regulatory Note

Training should address lessons learned



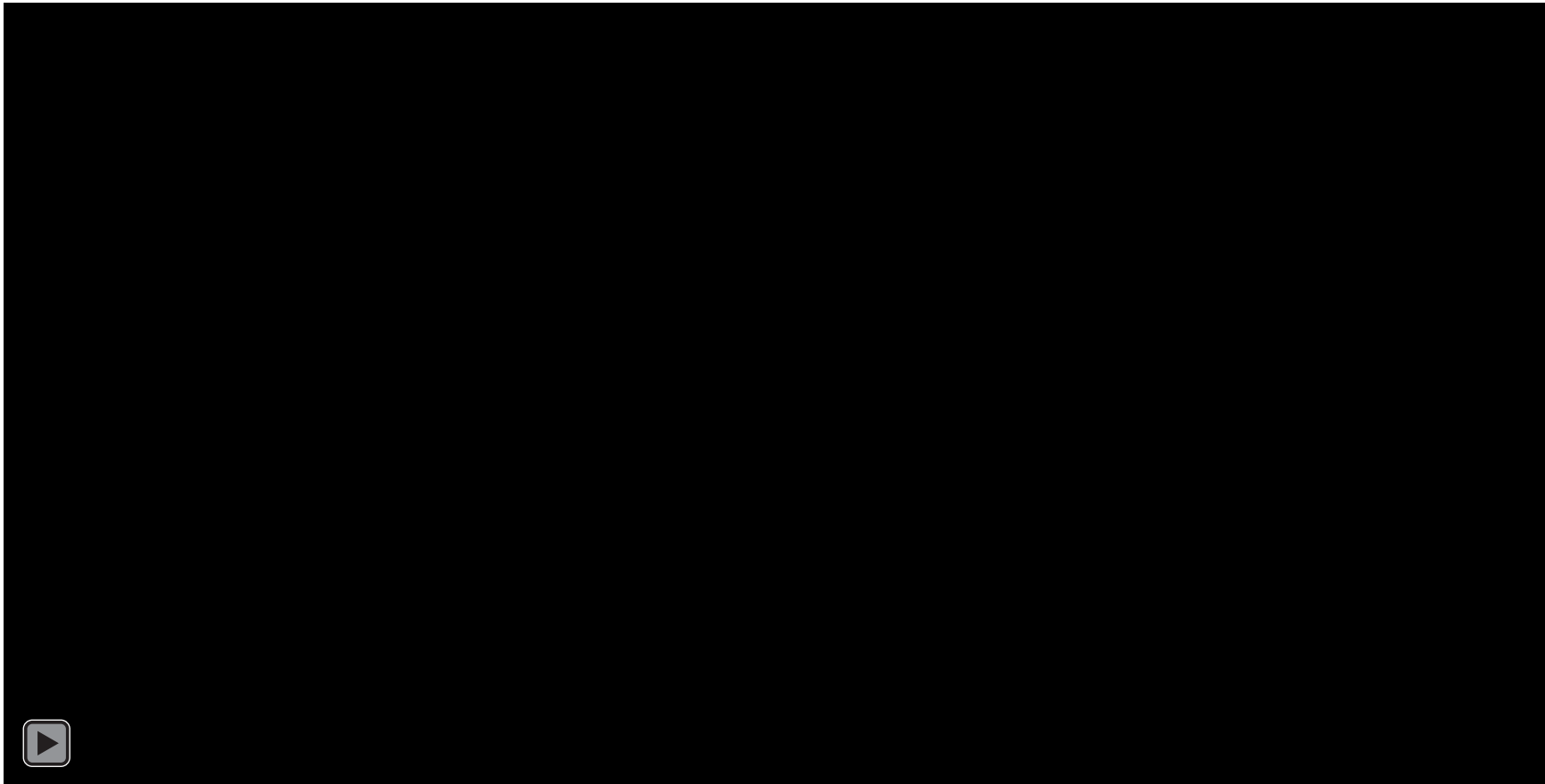
"Prosecutors should also assess whether the training adequately covers prior compliance incidents..."

"What has senior management done to let employees know the company's position concerning misconduct? § e.g., anonymized descriptions of the type of misconduct that leads to discipline)?"



Assessments should follow micro learning trends

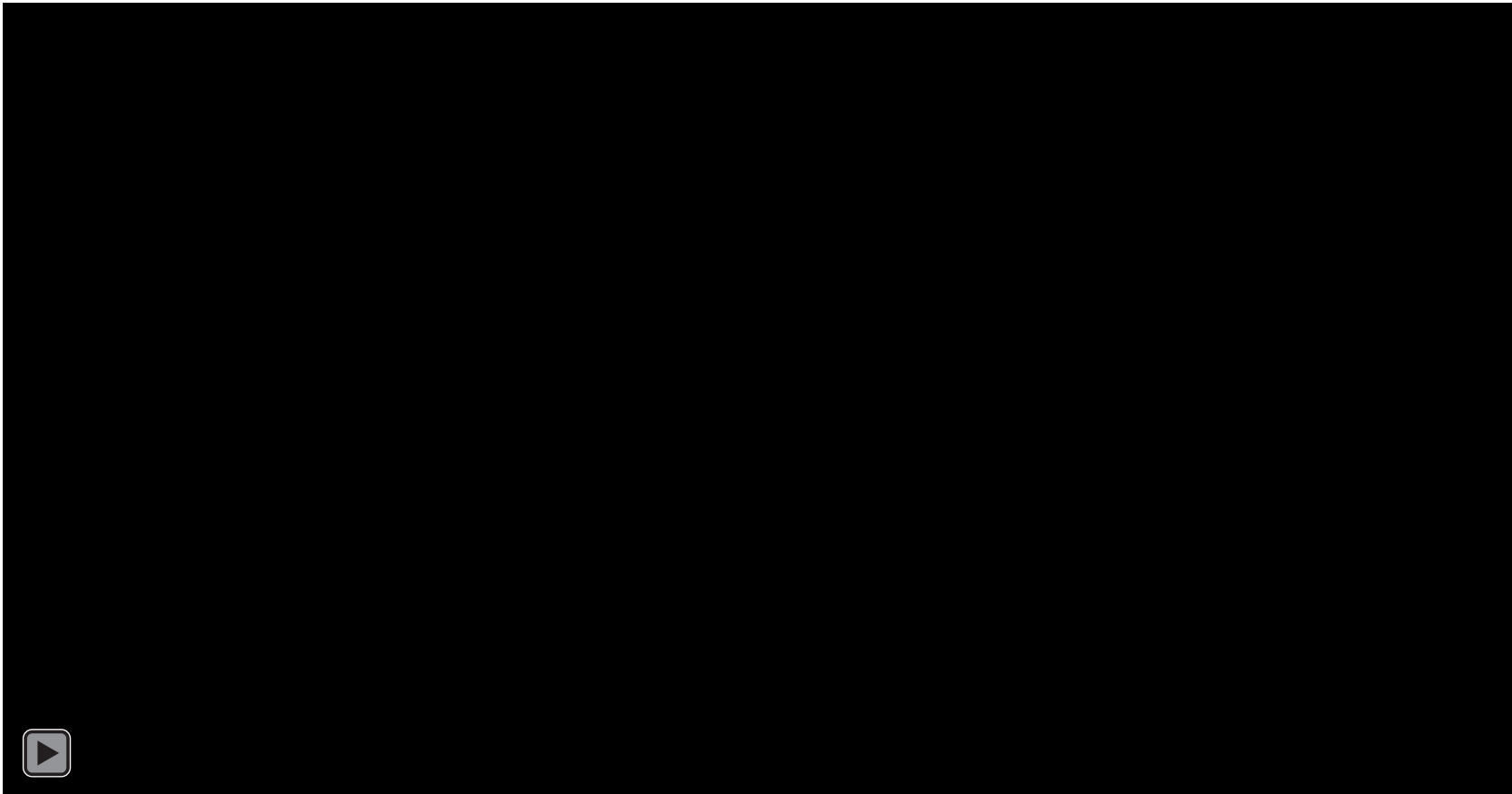
1) Ability to track success to gauge effectiveness of training; and





Assessments should follow micro learning trends

2) DOJ Guidance: "How has the company addressed employees who fail all or a portion of the testing?"





contenten**▶**blers

Providing compliance training based on both job function and compliance responsibility through engaging micro learning to reinforce key content concepts and support continuous learning efforts.



OCR and Content Enablers

Practitioner Packages

- U.S. Practitioner Certification Series
- Non-U.S. Practitioner Certification Series
- U.S. Customs Compliance for Practitioners
- U.S. Sanctions and Embargoes for Practitioners

Awareness Packages

- Export Compliance Overview: Leadership
- Export Compliance Overview for U.S. General Employee: Defense Controls
- Introduction to U.S. Sanctions and Embargoes
- Import Controls Overview: United States





THANK YOU