

Internal Compliance Program – Series (11)– Description of your product portfolio

Today, in the eleventh article in the hands-on practical advice series on Internal Compliance Programs for Export Control:

Part 11: Risk Assessment – Company Profile – Description of your product portfolio

You have already provided, in the risk assessment chapter, information on your business activity and customer base. Next step will be to focus on your products.

Before starting, please remind that you should give an overview on all your products, not only those that you deem relevant for export control. Taking it the other way around would alter the real risk level to what your company is actually exposed.

In this section, you should describe the products you are manufacturing, integrating and/or reselling. Please add pictures of the products here and give examples for application of these products. In what form are they found or manufactured? What are their ingredients? What are their specific features and characteristics? For what are they used? Are there competitors out there for the same products? Try to avoid too technical language here, as the purpose is to give your reader a complete, but concise overview for a risk assessment objective. Technical details may be added in the product classification sheets (more on that topic at a later stage).



Coming to product classification, you should provide here a rough understanding of the classification process followed by your company. Who is classifying? Are all products classified according to the templates (if they exist) provided by licensing authorities? You may provide here a graph showing the process flow and the approval procedure. What are the customs codes (CN, according to TARIC, for EU exporters) you are using for your products? How are the products classified under currently applicable dual-use and military control lists? Are there any restrictions if your goods are of a strictly civilian nature? Have you applied for and been granted (or refused) licenses, and for what type of products (please provide here a list of licenses)? Describe more in detail those products listed as dual-use or military items.

**Good of a strictly
civilian nature**



**Dual-use
item**



**Defence-related
product**



**Torture
good**



Catch-All

