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Internal Compliance Program - Series (27) - Internal Reporting

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

Part 27: Internal Reporting

Within the last chapter of your Internal Compliance Program, the objective is to provide clear guidance to employees regarding notification, escalation, and corrective action for times when there are problems or suspected problems with export transactions.

You should explain your company's notification program for reporting suspected incidents of export-related non-compliance.

Management should show that is fully committed to conducting business in compliance with the letter and spirit of the law and committed to fostering a safe environment for employees who raise questions or concerns about compliance. Employees should not only be encouraged to report suspected export violations, but also know that management views reporting suspected violations as an integral part of the company's compliance program and an important part of the responsibility and duty of each employee's job.

Employees should be ensured that it is their duty to speak up if they are unsure about the proper course of action or need advice, if they believe another employee is doing, or may be about to do, something that violates the company's compliance program, or if they believe that they have personally been involved in noncompliant activity.

In addition to this Management commitment, your ICP should indicate to whom employees should report suspected incidents of export-related non-compliance. Employees should also be enabled to make reports anonymously, for example by filing their report in a letterbox placed at the reception, and assured that those reports will be confidential and shared on a "need-to-know" basis only.

Considering that every problem is also a learning opportunity to enhance your company's ICP and its business and compliance processes, you should incorporate any lessons learned into your training and awareness programs and your next ICP update.

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