



Internal Compliance Program – Series (8) – Company Profile – Explaining your corporate structure

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

Part 8: Risk Assessment – Company Profile – Explaining your corporate structure

You have collected the required documents and information for the risk assessment chapter. You can now start drafting the Risk Assessment chapter.

Start by providing your business card

Licensing authorities like being provided with a complete overview of the company's structure, before reading furthermore on export control issues.

So, provide details of your company's name and trading name, corporate purpose, articles of association, address of head office, registration, VAT and business permit number, phone and email and logo. Do also list all domestic and foreign operating divisions, offices and manufacturing facilities.

Say a word on the place of your company within your group. Who are your parent company and other companies in the same group? Provide underlying corporate documents for those. It is good business practice to add a group structure chart to your document.

Does your company have subsidiaries, in your home country or abroad? if any, provide information on their activity and any export control related issues. Give a list with the name of the undertakings, the number of shares your company holds, ownership percentage, net equity and financial results.

You must indicate your company's shareholders. It is particularly relevant for authorities to know who has the saying in your company, who are the majority shareholders, how voting rights are distributed, who are minority shareholders. Attach all relevant corporate documents to your ICP manual.

Tell your readers about the company's founders, their initial business idea, the development of product range, business model and customer profile over time. Loose a word also if your company or group has been subject to mergers.

Put into light your management structure It goes without saying that licensing authorities are, in particular, interested in knowing who manages the company. How are your corporate bodies structured? Who does currently sit in the management board? Are those managers experienced? What were their previous career steps (provide CVs)? Who is able to legally commit the company (list of authorised signatures)? How is the company structured from an operational point of view? Who reports to whom? How many human resources are dedicated to the company in the different

divisions and locations? How many employees are involved in export related functions? Financial results should also have a place here. Provide your annual accounts for the last 3 years. Say a word on the development of your financial situation over the last years and your projects in the next future.

