

GLOBAL TRADE COMPLIANCE MANAGEMENT: AN EXTERNAL VIEWPOINT

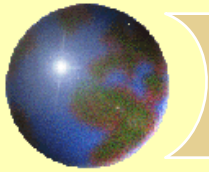
NON-U.S. TRADE CONTROLS: A DEEPER DIVE

**North Texas District Export Council
May 18, 2009**

**Daniel Mark Ogden, Esq.
Panel Moderator**



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Panel Overview

- **Multilateral and non-U.S. export controls compliance management**
- **Non-U.S. import and customs enforcement compliance management**
- **Trade controls compliance management strategic planning**
- **Trade controls compliance management internals design and structure**

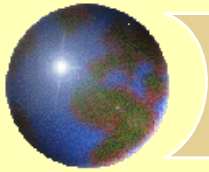


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Global Trade Compliance Management Overview

- **Develop a risk management approach**
- **Develop a highly granular approach-focus on the types of compliance issues which pertain to your industry, your products, and your business model**
- **Analyze the effects of trade controls on your local market entry & operating strategy-representative/distributor/branch/ subsidiary**
- **Determine who is the exporter and importer of record**

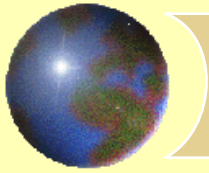


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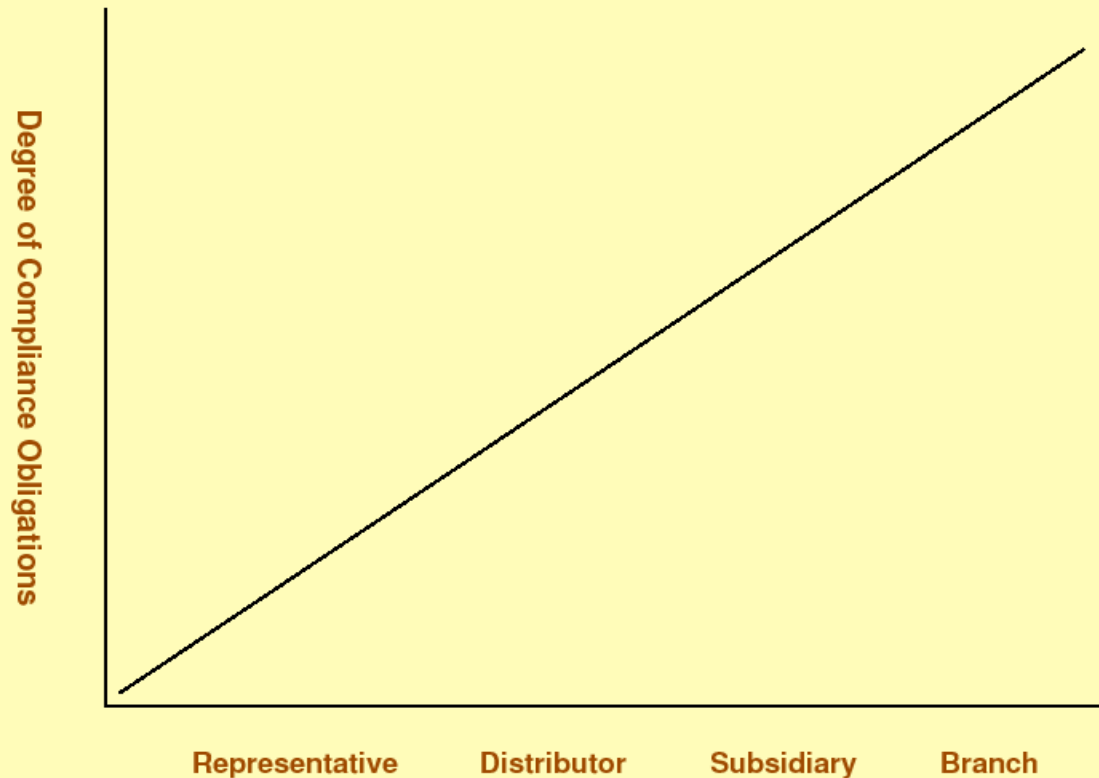
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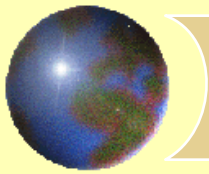
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U.S. Exporter Trade Controls Compliance Obligations

	U.S. Export Controls	Non-U.S. Import Controls	Non-U.S. Export Controls	Multilateral Export Controls
Representative	Yes	No	Maybe	Yes
Distributor	Yes	No	Maybe	Yes
Subsidiary	Yes	Maybe	Maybe	Yes
Branch	Yes	Yes	Yes	Yes

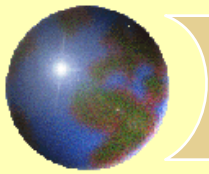


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