



Bureau of Industry and Security

U.S. Department of Commerce
Where Industry and Security Intersect

Core Elements of an Effective Export Management and Compliance Program (EMCP)

1. Management Commitment: Senior management must establish written export compliance standards for the organization, commit sufficient resources for the export compliance program, and ensure appropriate senior organizational official(s) are designated with the overall responsibility for the export compliance program to ensure adherence to export control laws and regulations.
2. Continuous Risk Assessment of the Export Program
3. Formal Written Export Management and Compliance Program: Effective implementation and adherence to written policies and operational procedures.
4. Ongoing Compliance Training and Awareness
5. Pre/Post Export Compliance Security and Screening: Screening of employees, contractors, customers, products, and transactions and implementation of compliance safeguards throughout the export life cycle including product development, jurisdiction, classification, sales, license decisions, supply chain, servicing channels, and post-shipment activity.
6. Adherence to Recordkeeping Regulatory Requirements
7. Internal and External Compliance Monitoring and Periodic Audits
8. Maintaining a Program for Handling Compliance Problems, including Reporting Export Violations
9. Completing Appropriate Corrective Actions in Response to Export Violations